

ASANTe INC

PRIVACY POLICY

Effective Date: June 15, 2026

Last Updated: June 15, 2026

1. INTRODUCTION

ASANTe INC (“**ASANTe**,” “**Company**,” “**we**,” “**our**,” or “**us**”) is committed to protecting the privacy, security, and integrity of the personal information entrusted to us.

This Privacy Policy (“**Policy**”) explains how we collect, use, disclose, store, transfer, and protect personal information when individuals access or use:

- the ASANTe mobile application;
- the ASANTe web platform;
- GoLocal Maps (golocalmaps.com);
- associated websites and services;
- promotional campaigns;
- calendar listings;
- business directories;
- rewards programs; and
- any related products or services (collectively, the “**Platform**”).

This Privacy Policy forms an integral part of the ASANTe Terms & Conditions and should be read together with those Terms.

2. SCOPE

This Privacy Policy applies to:

- Individual Customers
- Business Users
- Nonprofit Organizations
- Visitors of GoLocal Maps
- Event Organizers
- Registered Account Holders
- Individuals communicating with ASANTe

This Policy does not apply to third-party websites or services linked through the Platform.

3. DATA CONTROLLER

The Data Controller responsible for processing personal information is:

ASANTE INC

Maryland, United States

Privacy Contact:

privacy@asanteinc.com

General Contact:

golocalmaps@asanteinc.com

4. APPLICABLE PRIVACY LAWS

This Privacy Policy is designed to comply with applicable privacy and data protection laws including:

- General Data Protection Regulation (EU) 2016/679 (“GDPR”)
- UK GDPR
- California Consumer Privacy Act (CCPA), as amended by CPRA
- Colorado Privacy Act (CPA)
- Virginia Consumer Data Protection Act (VCDPA)
- Connecticut Data Privacy Act (CTDPA)
- Texas Data Privacy and Security Act (TDPSA)
- Oregon Consumer Privacy Act (OCPA)
- Montana Consumer Data Privacy Act (MCDPA)
- Delaware Personal Data Privacy Act (DPDPA)

Nothing in this Policy limits rights granted under applicable law.

5. WHO WE SERVE

The Platform connects:

- Businesses
- Nonprofit Organizations
- Customers

- Community Members

through:

- Personalized Rewards
 - GoLocal Maps
 - Business Directories
 - Community Events
 - Calendar Promotions
 - Digital Campaigns
 - Gratitude Cards (TCards)
 - TCredits
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6. INFORMATION WE COLLECT

A. Information You Provide

We collect information that you voluntarily provide, including:

Account Information

- Full name
- Email address
- Phone number
- Username
- Password
- Authentication credentials

Profile Information

- Profile photograph
- Biography
- Organization
- Business information
- Nonprofit information
- Website
- Social media links

Business Listings

- Business name
- Address
- Categories
- Operating hours
- Contact information

- Images
- Promotional content

Calendar Events

- Event descriptions
- Locations
- Dates
- Images
- Promotional materials

Customer Support

- Communications
 - Support requests
 - Feedback
 - Survey responses
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B. User Generated Content

We collect content voluntarily created through the Platform including:

- TCards
- Appreciation messages
- Reviews
- Comments
- Photos
- Business promotions
- Event submissions

Users remain responsible for all submitted content.

C. Transaction Information

We collect:

- TCredits activity
- Rewards redemption history
- Subscription information
- Payment confirmations
- Transaction identifiers

ASANTE does **not** store complete credit card numbers.

D. Automatically Collected Information

When you access the Platform we automatically collect:

- IP address
 - Device identifiers
 - Browser type
 - Operating system
 - Device model
 - Session duration
 - Pages viewed
 - Clickstream data
 - Referral URLs
 - Crash logs
 - Performance metrics
 - Network information
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E. Location Information

We may determine approximate location using:

- IP address
- Device settings
- User-provided business addresses

We do not continuously track precise GPS location unless expressly authorized.

F. Information From Third Parties

We may receive information from:

- Google Authentication
 - Apple Sign In
 - Facebook Login
 - Payment processors
 - Business partners
 - Marketing partners
 - Other users who invite you
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7. INFORMATION WE DO NOT INTENTIONALLY COLLECT

We do not intentionally collect:

- racial or ethnic origin
- religious beliefs
- political opinions
- biometric identifiers
- health information
- sexual orientation

unless voluntarily provided or legally required.

8. CHILDREN'S PRIVACY

The Platform is not intended for individuals under sixteen (16) years of age.

We do not knowingly collect personal information from children under sixteen without legally required authorization.

If we become aware that personal information from a child under sixteen has been collected improperly, we will promptly delete the information.

9. HOW WE USE PERSONAL INFORMATION

We use personal information to:

Provide Services

- create accounts
 - authenticate users
 - process transactions
 - provide rewards
 - operate GoLocal Maps
 - display business listings
 - manage events
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Improve Services

We analyze usage information to:

- improve usability

- develop new features
 - optimize performance
 - identify bugs
 - enhance customer experience
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Communications

We communicate regarding:

- account notices
- security alerts
- customer support
- transactional emails
- promotional communications (where permitted)

Users may opt out of marketing communications at any time.

Fraud Prevention

We process information to:

- detect abuse
 - prevent fraud
 - investigate violations
 - enforce Terms & Conditions
 - protect users and businesses
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Legal Compliance

We process information when necessary to:

- comply with law
 - respond to legal requests
 - establish legal claims
 - defend legal rights
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10. LEGAL BASIS FOR PROCESSING (GDPR)

We process personal information under one or more of the following legal bases:

Contract Performance

Processing necessary to provide Platform services.

Legitimate Interests

Including:

- improving services
- fraud prevention
- security
- analytics
- customer support

Consent

Where required by law including:

- marketing
- cookies
- optional permissions

Consent may be withdrawn at any time.

Legal Obligations

Processing required to comply with applicable laws.

11. ARTIFICIAL INTELLIGENCE

ASANTe may use artificial intelligence and automated technologies to:

- personalize recommendations
- recommend businesses
- recommend nonprofits
- suggest events
- improve rewards
- detect fraud
- optimize search
- improve platform functionality

We do not make solely automated decisions producing legal or similarly significant effects unless permitted by applicable law.

12. COOKIES AND TRACKING TECHNOLOGIES

We use:

- essential cookies
- authentication cookies
- analytics cookies
- security cookies
- preference cookies

Third-party providers may also place cookies consistent with their own privacy policies.

Users may manage cookie preferences through browser settings.

13. PUBLIC INFORMATION

Certain information is intentionally public including:

- business profiles
- nonprofit profiles
- business logos
- calendar events
- public promotions
- GoLocal Maps listings

Public information may be indexed by search engines.

Users should avoid posting confidential information in public areas.

14. DISCLOSURE OF INFORMATION

We do not sell personal information.

We may disclose information:

Service Providers

including:

- cloud hosting
- authentication providers
- analytics providers
- payment processors
- communication providers

Business Transfers

If ASANTe undergoes:

- merger
- acquisition
- financing
- bankruptcy
- sale of assets

personal information may be transferred.

Legal Requirements

We may disclose information:

- pursuant to court orders
 - government requests
 - law enforcement requests
 - protection of legal rights
 - fraud investigations
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With Your Consent

We may disclose information where you expressly authorize us.

15. SERVICE PROVIDERS

Current providers may include:

- DigitalOcean
- Stripe
- Twilio
- Google
- Google Firebase
- Apple
- Facebook
- Sentry

Additional providers may be added as Platform functionality evolves.

16. INTERNATIONAL DATA TRANSFERS

ASANTe operates primarily in the United States.

Personal information may be transferred internationally using appropriate safeguards including:

- Standard Contractual Clauses
 - contractual safeguards
 - organizational safeguards
 - technical safeguards
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17. DATA RETENTION

We retain information only as long as reasonably necessary.

Data Category	Typical Retention
Account Information	Until account deletion plus legal obligations
Business Listings	While active
Rewards History	7 years
Payment Records	7 years
Support Requests	3 years
Analytics Data	24 months
Security Logs	12 months
Marketing Preferences	Until withdrawn

Longer retention may occur when required by law.

18. SECURITY

We implement reasonable administrative, organizational, and technical safeguards including:

- encryption in transit
- access controls
- role-based permissions
- audit logging
- vendor security reviews
- monitoring
- incident response procedures

No system is completely secure.

19. YOUR PRIVACY RIGHTS

Subject to applicable law, you may have the right to:

- know what information we collect
- access personal information
- correct inaccurate information
- delete personal information
- obtain a portable copy
- restrict processing
- object to processing
- withdraw consent
- appeal certain decisions

Requests may be submitted to:

privacy@asanteinc.com

We may verify identity before processing requests.

20. CALIFORNIA PRIVACY RIGHTS

California residents have additional rights including:

- Right to Know
- Right to Delete
- Right to Correct
- Right to Opt-Out of Sharing
- Right to Data Portability
- Right to Limit Sensitive Personal Information (where applicable)
- Right to Non-Discrimination

ASANTE does not sell personal information.

21. PRIVACY RIGHTS FOR OTHER U.S. STATES

Residents of Colorado, Virginia, Connecticut, Texas, Oregon, Montana, and Delaware may exercise rights granted under applicable state privacy laws including:

- access
 - correction
 - deletion
 - portability
 - opt-out of targeted advertising
 - opt-out of profiling
 - appeals process where required
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22. DO NOT TRACK

Because there is currently no universally accepted standard for responding to browser Do Not Track signals, ASANTe does not respond differently to such signals.

23. CHANGES TO THIS POLICY

We may update this Privacy Policy periodically.

Material changes will be communicated through:

- Platform notifications
- email notifications
- website posting

The “Last Updated” date will always reflect the latest revision.

24. CONTACT US

Questions or requests concerning this Privacy Policy may be directed to:

ASANTE INC

Privacy Officer

privacy@asanteinc.com

General Support

golocalmaps@asanteinc.com

Maryland, United States

25. GOVERNING LAW

This Privacy Policy shall be governed by applicable United States federal law, the laws of the State of Maryland, and applicable international privacy regulations, including GDPR and UK GDPR where required.

Nothing in this Privacy Policy limits any mandatory consumer or data protection rights provided under applicable law.

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