

# Metasim Privacy Policy

## 1. Introduction

This privacy policy (Policy) relates to your personal information in connection with your use of and access to the MetaSim platform (the MetaSim Platform) and any services provided by MetaSim (the MetaSim Platform and services together forming the MetaSim Services).

We are committed to protecting your information and your right to privacy. If you have any questions or concerns about our Policy, or our practices with regards to your personal information, please contact us via [privacy@metasim.io](mailto:privacy@metasim.io).

When you use the MetaSim Services, you trust us with your information, and we take your privacy very seriously. 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. We hope you take some time to read through it carefully, as it is important. If there are any terms in this Policy that you do not agree with, please discontinue your use of the MetaSim Services.

## 2. Changes to this Policy or your personal information

We review this Policy regularly and it is your responsibility to check regularly and determine whether you still agree to comply with the Policy. If you do not agree to any changes to this Policy, then you must immediately stop using the MetaSim Services. In the event we make any significant changes to this Policy we will use our reasonable endeavours to inform you of such changes in advance in writing.

It is important that the personal information we hold about you is true, complete, accurate and current. Accordingly, you must notify us of any changes to your personal information (for example, if you change your email address).

## 3. About us

The MetaSim Services are owned and operated by MetaSim Limited (trading as "MetaSim"), a company registered in England and Wales with company number 13032303 and whose registered office is situated at the Carriage House, Mill Street, Maidstone, Kent, United Kingdom, ME15 6YE (MetaSim/we/us/our). MetaSim is the controller (also known as a data controller) of, and is responsible for, your personal information. The term "you" refers to the user wishing to access and/or use the MetaSim Services.

The MetaSim Platform provides next-gen training and development opportunities through immersive and authentic virtual reality experiences to help people acquire new skills faster and practice difficult situations in a highly realistic, engaging, and safe environment.

## 4. Information we may collect about you

### 4.1 Personal information you disclose to us

In Short: We collect personal information that you provide to us including information such as your name, contact information and job title.

#### (a) Where and how we collect personal information

We collect personal information that you voluntarily provide to us when registering to use and actually using the MetaSim Services, or otherwise contacting us.

If you apply or are put forward for a role with us, or work for us (either directly or indirectly) for any period of time, we also collect your personal information, which may include your contact details, financial and payment details, details of your education, qualifications and skills, your marital status, your nationality, your NI number, your job title and your CV.

More particularly, the personal information that we collect depends on the context of your interactions with us, the choices you make and the products and features you use. For example:

- We collect personal information via our website, mobile applications and other technical systems
- We collect personal information when you use our website or mobile applications to sign up to, participate in or receive a service from us, for example where you contact us, request information online, report an issue or provide feedback.
- Our website also uses cookies and collects IP addresses (for more information on this, see our Cookie Policy).
- We may monitor and record communications with you (such as telephone conversations and emails). We may do this for a number of reasons, such as to check the quality of our customer service, for training purposes, to prevent fraud or to make sure we are complying with legal requirements.

#### (b) The types of personal information we may collect

When you use the MetaSim Services and/or when you otherwise deal with us, we may collect the following information about you (the Information):

- Identity Data, which includes your first name, last name and gender;
- Contact Data, which means the data we use to contact you including email address, job title and contact number;
- Usage Data, which includes Information about how you use the MetaSim Services. This includes your browsing patterns and Information such as how long you might spend on one of our webpages on the MetaSim Platform and

what you look at and for, the page that referred you to the MetaSim Platform and the click stream during your visit to our website, page response times, and page interaction Information (for example, clicks you make on a page;

- Marketing and Communications Data, which includes your preferences with regards to receiving marketing from us and your other communication preferences;

#### 4.2 Personal information from third parties.

In Short: We may receive information about you from third parties, and we may use this information to provide, improve and personalise the MetaSim Services.

Occasionally we may receive information about you from other sources, which we will add to the information we already hold about you in order to help us provide, improve and personalise the MetaSim Services. If you apply for a job with us, we may also receive information from those who provide references relating to your prospective or actual engagement or employment.

#### 4.3 Information automatically collected

In Short: Some Information – such as IP addresses and/or browser and device characteristics – is collected automatically when you use the MetaSim Platform.

We automatically collect certain Information when you visit, use, or navigate the MetaSim Platform. This Information does not reveal your specific identity (unless your device name is the same as your name) but may include device and usage Information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, Information about how and when you use the MetaSim Platform and other technical Information. This Information is primarily needed to maintain the security and operation of the MetaSim Platform, and for our internal analytics and reporting purposes.

Like many businesses, we also collect Information through cookies and similar technologies. You can find out more about this in our Cookie Policy.

### 5. How do we use your Information?

In Short: We process your Information for purposes based on legitimate business interests, the fulfilment of our contract with you, compliance with our legal obligations, and/or your consent.

We use your Information collected via the MetaSim Services for a variety of business purposes described below. We process your Information for these purposes in reliance on our legitimate business interests (Business Purposes), in order to enter into or perform a contract with you (Contractual Reasons), with your consent (Consent), and/or for compliance with our legal obligations (Legal Reasons). We

indicate the specific processing grounds we rely on next to each purpose listed below.

We may process your Information for the following purposes:

- To provide the MetaSim Services (Business Purposes or Contractual Reasons). This includes collecting and using your personal information to:
  - ◆ Contact you for reasons related to the MetaSim Services;
  - ◆ Enable us to follow up on enquiries made by you in relation to the MetaSim Services and/or to provide information you have requested;
- To contact you regarding enquiries you have made in relation to the MetaSim Services;
- To facilitate a recruitment process in which you are involved.
- To send administrative Information to you for Business Purposes, Legal Reasons and/or possibly Contractual Reasons. We may use your Information to send you product, service, and new feature information and/or information about changes to our terms and policies, as may be in place from time to time.
- To send you marketing and promotional communications for Business Purposes and/or with your Consent. We and/or our brand partners may use your Information for our marketing purposes, if this is in accordance with your marketing preferences. You can opt-out of our marketing emails (see below for further details).
- To facilitate account creation and the log-in process with your Consent.
- To request feedback for our Business Purposes and/or with your Consent. For example, we may use your Information to request feedback and to contact you about your use of the MetaSim Platform.
- To protect the MetaSim Services for Business Purposes and/or Legal Reasons. We may use your Information as part of our efforts to keep the MetaSim Services safe and secure (for example, for the purposes of monitoring and/or preventing fraud).
- To enforce any terms policies for Business Purposes, Legal Reasons and/or possibly Contractual Reasons.
- To respond to legal requests and prevent harm for Legal Reasons. For example, if we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- We may use your Information for other Business Purposes, such as data analysis, identifying usage trends, determining the effectiveness of our

promotional campaigns and to evaluate and improve the MetaSim Services, our products and services, our marketing and your experience.

## 6. Will your Information be shared with anyone?

In Short: We only share Information for Contractual Reasons, to fulfil our Business Purposes, or with your Consent.

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

- Compliance with Legal Obligations. We may disclose your Information where we are legally required to do so in order to comply with applicable laws, governmental requests, judicial proceedings, court orders, or legal processes, such as in response to a court order or a subpoena (including in response to requests from public authorities in order to meet national security or law enforcement requirements).
- Vital Interests. 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, illegal activities or situations involving potential threats to the safety of any person, or where we believe it is necessary for the purpose of providing evidence in connection with litigation proceedings in which we are involved.
- Third Party Service Providers. We may share your Information with third party vendors, service providers, credit reference agencies, trade associations of which we are a member, credit card associations, contractors or agents who perform services and require access to such Information to carry out that work. Examples include: third party software developers. Such third parties will only have access to your Information to the extent that they need to perform those services. They are required to keep your Information confidential and may not use it other than as we ask them to and always in accordance with this Policy.
- 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 visit the MetaSim Platform. These companies may use Information about your visits to the MetaSim Platform and other websites that are contained in web cookies and other tracking technologies in order to provide personalised advertisements about goods and services that may be of interest to you. See our Cookie Policy for further Information.
- With your Consent. We may disclose your Information for any other purpose with your Consent.

We may disclose aggregated, anonymous Information (i.e., Information from which you cannot be personally identified), or insights based on such anonymous Information, to selected third parties, including (without limitation) analytics and search engine providers to assist us in the improvement and optimisation of the MetaSim Services. In such circumstances we will not disclose any Information which can identify you personally.

## 7. Is your Information transferred internationally?

In Short: We may transfer, store, and process your Information in countries other than the UK, but will take all reasonable steps to ensure it is protected.

Whenever we transfer your Information outside of the UK, we will take all reasonably practicable measures to protect your Information in accordance with this Policy and applicable laws. To the extent that any transfer requires approved safeguards to be in place we will only transfer your Information to countries that have been deemed to provide an adequate level of protection for personal data. Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK. Please contact us if you want further information on the specific mechanism(s) used by us when transferring your personal data out of the UK.

## 8. Third party websites

In Short: We are not responsible for the safety of any Information that you share with third party providers who feature or advertise, but are not affiliated with, the MetaSim Services.

The MetaSim Platform may feature links to third party websites or social media channels or 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 Policy.

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 MetaSim Platform. You should review the policies of such third parties and contact them directly if you have any related questions.

## 9. For How long do we keep your Information?

In Short: We keep your Information for as long as necessary to fulfil the purposes outlined in this Policy unless a longer retention period is permitted or required by law.

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

When we have no ongoing Business Purpose to justify the processing of your Information, we will either delete or anonymise it, or, if this is not possible (for example, because your Information has been stored in backup archives), then we will securely store your Information and isolate it from any further processing until deletion is possible.

## 10. How do we keep your Information safe?

In Short: We aim to protect your Information through a system of organisational and technical security measures.

We have implemented appropriate technical and organisational security measures designed to protect the security of any Information we process. For example, we store your personal data on secure servers and company data is stored on separate secure encrypted disks when not in use.

We have procedures in place to deal with any suspected data security breach. We will notify you and any applicable supervisory body of a suspected data breach where we are legally required to do so.

However, please also remember that we cannot guarantee that the Internet itself is 100% secure. Although we will use our reasonable endeavours to protect your Information, we cannot guarantee the security or integrity of personal Information that is transferred from you or to you via the Internet. Transmission of personal Information to and from the MetaSim Platform is therefore at your own risk. You should only access our services within a secure environment.

## 11. Your Consent to processing

You will be required to give Consent to certain processing activities before we can process your Information. Where applicable, we will seek Consent from you when you first submit Information to or through the MetaSim Services.

If you have previously given your Consent, you may freely withdraw such Consent at any time. You can do this by emailing [privacy@metasim.io](mailto:privacy@metasim.io) or, where applicable, clicking the 'Unsubscribe' button that appears in mailing list communications.

If you withdraw your Consent, and if we do not have another legal basis for processing your Information, then we will stop processing your Information. If we do have another legal basis for processing your Information, then we may continue to do so subject to your legal rights.

Please note that if we need to process your Information in order for you to use the MetaSim Services and you object or do not provide Consent to us processing your Information, you accept that the MetaSim Services will no longer be available to you.

## 12. Marketing and opting out

If you have given Consent to marketing, we may contact you about our products, services, promotions, and special offers. If you no longer wish to receive such Information, you can withdraw your Consent at any time by sending an email to [privacy@metasim.io](mailto:privacy@metasim.io) or unsubscribing from the communications.

If you have given Consent, we may share your Information with carefully selected third party organisations and business partners and they may contact you directly. If you would prefer to no longer receive direct marketing communications from third parties and partners after previously giving your Consent, please contact those third parties and partners directly to withdraw the Consent.

Where you opt out of receiving marketing messages, this will not apply to personal data provided to us in connection with your use of the MetaSim Services.

## 13. What are your privacy rights?

In Short: You have certain rights in respect of your Information.

You have certain rights in relation to the Information that we hold about you. Details of these rights and how to exercise them are set out below. Please note that we will require evidence of your identity before we are able to respond to any requests. This is a security measure to ensure that your Information is not disclosed to a person who does not have the right to receive it. We may also contact you to ask you for further Information in relation to your request to speed up our response. To exercise or discuss any of your rights, please contact us via [privacy@metasim.io](mailto:privacy@metasim.io).

- Right of Access. You have the right at any time to ask us for a copy of the Information that we hold about you and to check that we are lawfully processing it. Where we have good reason, and where data protection law permits, we can refuse your request for a copy of your Information, or certain elements of the request. If we refuse your request or any element of it, we will provide you with our reason(s) for doing so.
- Right of Correction or Completion. If Information we hold about you is not accurate or is out of date and requires amendment or correction, you have a right to have the data rectified or completed.
- Right of Erasure. In certain circumstances, you have the right to request that the Information we hold about you is erased (for example, if the Information is no longer necessary for the purposes for which it was collected or processed, or our processing of the Information is based only on your Consent and there are no other legal grounds on which we may process the Information).
- Right to Object to or Restrict Processing. In certain circumstances, you have the right to object to our processing of your Information (for example, if we are processing your Information on the basis of our legitimate interests but

there are no longer any compelling legitimate grounds to justify our processing overriding your rights and interests).

You may also have the right to restrict our use of your Information, for example during a period in which we are verifying the accuracy of your Information in circumstances where you have challenged the accuracy of that Information.

- Right of Data Portability. In certain instances, you have a right to receive the Information that we hold about you (or a portion thereof) in a structured, commonly used and machine-readable format.

In such circumstances, you can ask us to transmit your Information to you or directly to a third-party organisation on your behalf.

While we are happy for such requests to be made, we are not able to guarantee technical compatibility with a third-party organisation's systems. We are also unable to comply with requests that relate to personal Information of others without their consent.

If we are relying on Consent to process your 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 that occurred before the withdrawal of such Consent.

## 14. Contact us

We welcome your feedback and questions on this Policy. If you wish to contact us about this Policy or have any other questions, please email us via [privacy@metasim.io](mailto:privacy@metasim.io).

You have the right to make a complaint at any time to the Information Commissioner's Office (the ICO), the UK supervisory authority for data protection issues (<https://ico.org.uk/concerns>). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.