



Privacy Policy

Cultioo Business App – Seller Side

Valid for: United States of America

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Governing Entity: Cultioo Inc., a Delaware Corporation

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1. Introduction and Scope

1.1 Purpose of This Privacy Policy

This Privacy Policy informs sellers (hereinafter "Users," "you," or "your") about the nature, scope, and purpose of the processing of personal data in connection with the use of the Cultioo Business App (the "App" or "Platform").

Privacy and Data Protection Are Our Priority.

Cultioo Inc. is committed to protecting your personal data in compliance with the privacy laws of the United States, including:

- California Consumer Privacy Act (CCPA) and California Privacy Rights Act (CPRA)
- Virginia Consumer Data Protection Act (VCDPA)
- Colorado Privacy Act (CPA)
- Connecticut Data Privacy Act (CTDPA)
- Utah Consumer Privacy Act (UCPA)
- Federal Trade Commission (FTC) Act
- INFORM Consumers Act

1.2 Scope

This Privacy Policy applies to all sellers who:

- Use the Cultioo Business App in the United States of America
- Offer products through the Cultioo marketplace platform
- Register or manage a seller account



1.3 What Is the Cultioo Business App?

The Cultioo Business App is the dedicated seller and operations suite of the Cultioo ecosystem – the supply-side interface of the marketplace. It serves three distinct user roles within the same application:

Role	Description
Admin (Group Founder)	Full administrative authority over the seller group. Manages revenue consolidation, invoice download, group configuration, and Order Approval Protocol.
Member (Sales & Inventory)	Responsible for creating product listings, managing inventory, and processing orders.
Operator (Gatekeeper)	Authorized to use the Scanner Interface at the facility gate: verifies arriving Delvioo™ drivers, performs cargo inspection, and executes the digital QR handshake. No access to financial or administrative data.

The app also contains the **Delvioo™ Driver Portal** – a standalone logistics environment for professional drivers. The Delvioo™ Driver Portal is governed by a separate privacy policy. This document applies exclusively to the **Business Portal (Seller Side)**.

1.4 Consent Through Use

By registering for the Cultioo Business App or making changes in the settings, you provide your express consent to the processing of your personal data in accordance with this Privacy Policy.



2. Responsible Party and Contact Information

2.1 Responsible Company

Cultioo Inc.
A Delaware Corporation
8 The Green, Ste A
Dover, DE 19901
United States of America

Main Contact: privacy@cultioo.com

2.2 Data Protection Officer

Privacy Coordinator:
Cultioo Inc.
Attn: Privacy Officer
Email: privacy@cultioo.com

You can contact our Privacy Coordinator directly at any time to ask questions about data protection or to assert your rights.

2.3 Online Request Portal

https://cultioo.com/en/en_cultioo_business_app_info#privacy



3. Definitions

3.1 Personal Information

Information that relates to an identified or identifiable natural person, including names, addresses, email addresses, phone numbers, financial data, transaction data, and other identifiers.

3.2 Sensitive Personal Information (SPI)

A subcategory of personal information requiring enhanced protection:

- Precise location data (pickup location)
- Financial accounts and payment information
- Tax identification numbers
- Contents of private communications

3.3 Sale

The disclosure of personal information to third parties for monetary or other valuable consideration.

3.4 Sharing

The disclosure of personal information for purposes of cross-context behavioral advertising.

3.5 Service Provider

A business that processes personal information on behalf of Cultioo and is contractually bound to use the data exclusively for agreed-upon purposes.

3.6 High-Volume Seller

A seller who, according to the INFORM Consumers Act, in any 12-month period:

- Has made **200 or more** discrete sales; **AND**
- Has earned **\$5,000 or more** in gross revenues

4. Registration and Consent

4.1 Registration Requirement

Use of the Cultioo Business App requires complete registration as a seller. You must provide truthful, current, and complete information.

The Business Portal is an upgrade layer on top of a standard Cultioo User Account. In addition to standard account data, sellers must provide:

Field	Description
Company Name	Legal registered business name
Official Website	Company web presence
Professional Description	Concise description of the business and product range
Corporate Profile Picture / Logo	Visual identity for the seller profile
Operational Scale	Declaration of workforce size (employee count)
Security Verification	Mandatory 8-digit email verification code to finalize the Business Upgrade

Before listings can be published and payouts received, sellers must additionally complete Stripe Connect KYC tax documentation. This step is



mandatory – browsing and group hierarchy setup remain available without it, but all commercial activity requires completed verification.

4.2 Express Consent

When registering or changing your data in the settings:

- You expressly consent to the processing of your personal data
- You confirm that you have read and understood this Privacy Policy
- You consent to the sharing of your data with third parties (buyers, Delvioo™, Stripe) for the purposes described

4.3 Right to Withdraw

You have the right to withdraw your consent at any time. The withdrawal does not affect the lawfulness of processing based on consent before its withdrawal.

4.4 Data Storage Upon Registration

When registering or changing data, it is securely stored in the Cultioo database. Passwords are stored exclusively in hashed (encrypted) form.

5. Categories of Data Collected and Processing

Purposes

In accordance with CCPA/CPRA, Cultioo discloses the following categories of personal information collected from sellers in the last 12 months:

5.1 Detailed Overview of Data Categories

CCPA/CPRA Category	Examples of Data Collected	Source of Collection	Primary Purpose	Disclosed to Third Parties
A: Identifiers	Name, username, email, phone, business address, tax ID	Seller registration, account settings	Account management, INFORM Act compliance, communication	Yes (buyers, Delvioo™, Stripe, tax authorities)
B: Personal Records Information	Full name, business name, address, phone	Seller registration	Contract performance, product pickup	Yes (buyers, Delvioo™)
D: Commercial Information	Product listings, sales history, transaction records, prices, revenues	Seller activity	Transaction processing, revenue tracking, payouts	Yes (Stripe, tax authorities)
F: Internet / Network Activity	IP address, device information, access times, app usage	Automatic collection	Security, debugging, analytics	Yes (IT service providers)
G: Geolocation Data	Precise pickup location	Seller input	Logistics, product pickup by Delvioo™	Yes (Delvioo™ Driver)
H: Financial Information	Bank account number, routing number,	Seller input for payouts	Payout of sales proceeds	Yes (Stripe Inc.)



CCPA/CPRA Category	Examples of Data Collected	Source of Collection	Primary Purpose	Disclosed to Third Parties
K: Sensitive Personal Information (SPI)	payment information Tax ID (SSN/EIN), financial accounts, pickup location, message contents	Seller input, communication	Tax compliance, payment processing, logistics	Yes (Stripe, Delvoo™, tax authorities)

5.2 Detailed Description of Data Categories

A. Identification Data and Business Information

Collected Data:

- Full name (natural person or business owner)
- Business name (if applicable)
- Username
- Email address
- Phone number
- Complete business address
- Tax identification number (SSN for individuals, EIN for businesses)

Processing Purposes:

- Creation and management of your seller account
- Compliance with INFORM Consumers Act (disclosure to buyers)
- Authentication and identity verification
- Communication regarding transactions
- Tax reporting obligations



Sources: Direct input during registration.

B. Product and Transaction Data

Collected Data:

- Product listings (title, description, images, prices, regulatory compliance data)
- Inventory management records
- Sales history
- Transaction details (sale date, amount, buyer information)
- Product categories and Transport Matrix data (Incoterms, vehicle type requirements, temperature specifications, pickup and delivery coordinates)
- Shipping and pickup details

Processing Purposes:

- Display of your products on the buyer marketplace
- Processing of sales
- Calculation of commissions
- Revenue tracking and reporting
- Tax documentation

Sources: Seller activity in the app.

C. Financial and Payout Data

Collected Data:

- Bank account number
- Bank routing number
- Account holder name
- Financial institution information
- Payout history

IMPORTANT: Cultioo does NOT store your complete financial data.

Your bank data is securely managed by Stripe Inc. (PCI-DSS Level 1



certified). Cultioo only stores a Stripe token (encrypted placeholder). This ensures the highest security for your sensitive financial data.

Processing Purposes:

- Payout of your sales proceeds
- Financial compliance (KYC, AML)
- Tax reporting

Sources: Seller input in account settings.

D. Tax-Relevant Data

Collected Data:

- W-9 Form (for US sellers: name, TIN/SSN/EIN, address, signature)
- W-8BEN Form (for international sellers)
- Tax identification number
- Tax status and classification

Processing Purposes:

- Fulfillment of IRS reporting obligations (Form 1099-K)
- Withholding and reporting of taxes
- Compliance with US tax laws

Legal Basis: Legal obligation (IRS regulations)

Sources: Seller input, Stripe tax reporting.

E. Communication Data (Messenger)

Collected Data:

- Complete message history between seller and buyer
- Message timestamps
- Status (read/unread)

Processing Purposes:



- Enabling communication for transaction processing
- Dispute resolution
- Fraud prevention

Access Restriction:

- Only seller and buyer have access to their message history
- Cultioo employees generally have no access, except in cases of: reasonable suspicion of fraud, legal obligations, or technical issues (with consent)

Sources: Direct input by seller in messenger.

F. Location Data (Pickup Location)

Collected Data:

- Precise pickup location for product pickup
- Address details (auto-converted to GPS coordinates for route calculation)

Processing Purposes:

- Enabling product pickup by Delvoo™ Driver
- Route optimization

IMPORTANT: Limited Use — Location data is used exclusively for the pickup process. No permanent tracking or profiling. Strictly purpose-bound.

Sources: Seller input during listing creation (Transport Matrix) and transaction processing.

G. Technical Usage Data

Collected Data:

- IP address
- Device type and model
- Operating system and app version
- Access times



- Usage statistics
- Error messages

Processing Purposes:

- Ensuring IT security
- Bug fixing and debugging
- Improving app functionality
- Usage analysis

Sources: Automatic collection during app usage.

6. Legal Basis for Data Processing

Although US privacy laws do not require explicit "legal bases" like GDPR, Cultioo processes data on the following grounds:

6.1 Contract Performance

Purpose: Fulfillment of the seller agreement between you and Cultioo

Affected Data:

- Account data
- Product listings
- Transaction data
- Communication data
- Pickup location data

Justification: Without this data processing, we cannot provide you with the agreed services.

6.2 Legal Obligations

Purpose: Compliance with legal requirements



Affected Data:

- Tax forms (W-9, W-8BEN)
- Transaction records
- Identity data (INFORM Act)

Applicable Laws:

- Internal Revenue Code (IRS reporting obligations)
- INFORM Consumers Act
- Anti-Money Laundering (AML) regulations
- Know Your Customer (KYC) requirements

Justification: We are legally required to collect and report this data.

6.3 Legitimate Business Interests

Purpose: Operation and improvement of the platform, fraud prevention

Affected Data:

- Technical usage data
- Message contents (in case of fraud suspicion)

Justification:

- Ensuring platform security
- Protection against fraud and abuse
- Improving user experience

Balancing: Our legitimate interests do not override your privacy rights. You can object at any time.

7. Data Storage and Data Security

7.1 Highest Priority for Data Security

Privacy and Security Are Our Priority.

Cultioo implements comprehensive technical and organizational measures (TOMs) to protect your data from unauthorized access, loss, or misuse.

7.2 Technical Security Measures

a) Encryption

- **Transmission Encryption:** All data transmissions occur via HTTPS/TLS-encrypted connections
- **Password Encryption:** Passwords are stored encrypted using an irreversible hashing procedure (bcrypt/Argon2)
- **Data Storage:** Sensitive data is stored encrypted in the database

b) Access Control

- **Strict Access Rights:** Only authorized employees with legitimate business needs have access to data
- **Multi-Factor Authentication:** Required for critical system access
- **Password Confirmation:** Changes to critical data (password, account deletion) require password entry

c) Tokenization of Financial Data

Highest Security for Payment Information:

- Cultioo never stores your complete bank data or credit card numbers
- All financial data is managed by Stripe Inc. (PCI-DSS Level 1)
- Cultioo only stores Stripe tokens (encrypted placeholders)
- Even in the event of a data breach, your financial data remains secure

d) Secure Data Deletion

- **Irreversible Deletion:** Deleted data is permanently removed using secure deletion methods
- **No Recovery:** After account deletion, data cannot be recovered

7.3 Organizational Security Measures

a) Employee Training

- Regular data protection and security training
- Commitment to confidentiality
- Enforcement of security best practices

b) Security Audits

- Regular penetration testing
- Security reviews by external experts
- Continuous monitoring for security incidents

c) Incident Response

- Established emergency plan for data breaches
- Immediate notification of affected users
- Cooperation with authorities when needed

7.4 Infrastructure Security

- **Professional Data Centers:** Use of certified, highly secure data centers
 - **Redundant Systems:** Fail-safe architecture
 - **Regular Backups:** Secure data backups to ensure data integrity
-

8. Payment Processing via Stripe Connect

8.1 Exclusive Use of Stripe

Cultioo has outsourced all payment processing and payout of sales proceeds to Stripe Inc., a leading PCI-DSS Level 1 certified payment service provider.

8.2 Why Stripe?

- PCI-DSS Level 1 certification (highest standard of the payment card industry)
- Compliance with all US financial regulations
- Encrypted storage of all financial data
- Global recognition and trustworthiness

8.3 Data Processing by Stripe

Stripe processes the following data:

- Complete bank account information
- Payment history
- Payout details
- Tax forms (W-9, W-8BEN)
- KYC/AML verification data

Cultioo stores:

- Only Stripe tokens (encrypted placeholders)
- Payout history (amounts and dates)
- Verification status

8.4 Payout Schedule Configuration

Sellers may configure their payout schedule within the app. The following options are available:



Schedule	Description
Daily	Maximum liquidity – optimized for high-volume operations requiring continuous cash flow
Weekly	Standard business operations and mid-size merchant workflows
Monthly	Consolidated monthly reporting and accounting reconciliation cycles
Manual (On-Demand)	Minimum \$10 balance required – 1.5% processing fee applies for instant transfer

Payment Rails: SEPA (Europe), ACH and Wire (United States), verified Debit/Credit cards – all secured via Stripe's encrypted infrastructure.

5% Service Fee: A 5% service fee is automatically deducted from every payout and retained by Cultioo as the platform commission.

Payment Release Mechanism: Payment to the seller is not released until the buyer explicitly confirms receipt of the goods within the Cultioo App. This escrow mechanism protects both parties.

8.5 Stripe as Independent Controller

Important Role Distribution:

- **For payout processing:** Stripe acts as a Service Provider of Cultioo
- **For compliance activities:** Stripe acts as an independent controller for: KYC verification, AML checks, tax reporting to IRS, and PCI-DSS compliance

8.6 Stripe Privacy Policy

Stripe is subject to its own privacy policy: <https://stripe.com/privacy>

We strongly recommend that you read the Stripe Privacy Policy to understand how Stripe processes your data.

8.7 Disclaimer

Cultioo assumes no responsibility or liability for the security or use of data processed by Stripe. Use of Stripe is at your own risk as a third-party service.

9. Logistics and Product Pickup (Delvoo™)

9.1 Delvoo™ as Logistics Partner

Cultioo partners with Delvoo™, the integrated professional transport network embedded within the Cultioo Business App, for pickup of sold goods from sellers.

9.2 Fulfillment Options and Data Flow

From the Order Details screen, sellers choose between two fulfillment modes, each with different data processing implications:

Option A – Delvoo™ Fulfillment (Active)

When Delvoo™ is enabled, the order proceeds through the standard Transport Auction workflow. Once enabled and a driver has been compensated, the toggle locks permanently – the order is committed to Delvoo™ fulfillment with no further modification permitted.

Option B – Self-Arranged Delivery

When Delvoo™ is disabled (prior to any driver assignment or payment), the seller provides the following data to complete the order record and enable buyer collection:

Field	Description
Production Date	Date the goods were produced or harvested
Best Before / Expiry Date	Shelf life endpoint for the product
Storage Number	Warehouse or storage unit identifier for pickup coordination

Cultioo assumes no logistics data processing responsibility under Option B beyond storing these fields in the order record.

9.3 Data Shared with Delvoo™ Driver

To enable successful product pickup, the Delvoo™ Driver receives the following information:

Data	Purpose
Seller name/username	For identification at the gate
Precise pickup location	Exact address for product pickup, auto-converted to GPS coordinates
Phone number	Exclusively for emergency contact (e.g., difficulty finding address)
Email address	Exclusively for emergency contact

9.4 Gate Verification — Data Captured by On-Site Operators

All Delvoo™ pickups at seller facilities pass through a mandatory seller-side gate verification protocol executed via the Cultioo Scanner App by the seller's Operator. The following data is captured, permanently archived, and transmitted to the buyer-side operator and the driver:

Check-In Data (Driver Arrives, Vehicle Empty):

- Gate and loading bay assignment
- Driver identity verification (cross-referenced against Delvoo™ KYC profile)
- License plate scan and vehicle type confirmation
- PPE compliance record (high-visibility vest, safety footwear)
- Vehicle hygiene inspection record (cleanliness, odor, moisture, prior cargo residue)
- Cleaning Certificate status (Valid / Missing / Expired)
- Pre-loading vehicle condition photographs (2–3 images, timestamped and geotagged)
- Tare weight (empty vehicle, measured on facility scale)
- Arrival timestamp

Check-Out Data (Vehicle Loaded, Ready for Departure):

- Gross weight (fully loaded vehicle)
- Net weight calculation (Gross minus Tare — legally binding delivery weight)
- Production Date, Best Before / Expiry Date, Batch Number, Storage Number, and optional Notes
- Departure temperature (for cold chain cargo, measured immediately before sealing)
- Load security confirmation
- Dispatch condition photographs (2–3 images, timestamped, geotagged, permanently stored)
- Seal number (tamper-evident physical seal applied to load compartment — scanned or manually entered)
- All compliance documents (Organic Certification, Origin Certificate, Analysis Reports, Bill of Lading)
- Automated digital delivery note (auto-populated from all check-out data)
- Digital signatures from both seller-side operator and driver
- Departure QR scan and authorization

All data captured during the seller-side check-out is stored immediately in the platform database and transmitted in real time to the buyer-side operator — forming the complete chain of custody record that is cross-referenced upon arrival at the buyer facility.

9.5 Delvoo™ as Service Provider

Contractual Safeguards: Delvoo™ acts as a Service Provider of Cultioo. Delvoo™ is contractually obligated to:

- Use data exclusively for pickup and delivery purposes
- Not use data for own commercial purposes
- Not resell or share data
- Implement appropriate security measures
- Delete data after completion of pickup

9.6 Delvoo™ Driver as Independent Contractor

IMPORTANT CLASSIFICATION: The Delvoo™ Driver acts as an independent contractor, NOT as an employee of Cultioo or Delvoo™.

Liability:

- The Driver is liable for damages or losses during transport
- Cultioo is not liable for actions or omissions of the Driver

9.7 Data Protection During Pickup

- Location data is used exclusively for pickup
- No permanent storage or tracking beyond the order record
- No profiling or behavioral analysis
- Pickup location data is deleted after delivery completion

10. Messenger Function and Communication Data

10.1 Purpose of Messenger Function

The Cultioo Business App offers an integrated messenger function for direct communication between sellers and buyers to clarify transaction

details and facilitate the sales process. Sellers may also communicate directly with Delvoo™ Drivers to coordinate gate arrival times, loading instructions, and transport delays.

10.2 Storage of Message History

- The complete message history between seller and buyer is stored in the Cultioo database
- Storage serves availability for both parties
- Messages are not made public or forwarded to third parties

10.3 Supported Communication Features

Feature	Description
Customer Relations	Direct channel to buyers – clarify product specifications, negotiate bulk deals, handle post-sale inquiries
Logistics Integration	Direct communication with Delvoo™ Drivers – coordinate gate arrival times, loading instructions, and transport delays
Document Exchange	Send high-resolution photos for load-security or damage documentation; upload and transfer PDFs and digital certificates (bills of lading, customs paperwork, technical certificates)
Priority Management	Pin critical active orders or VIP customers to the top of the inbox for immediate access
User Moderation	Block or delete entities to maintain a professional and secure communication environment

10.4 Access Restriction

Exclusive Access:

- Only seller and buyer have access to their respective message history
- No sharing with third parties

Limited Cultioo Access: Cultioo employees generally have no access to private messages, except in the following exceptional cases:

- **Fraud Suspicion:** In case of reasonable suspicion of fraudulent activities
- **Legal Obligations:** In case of court orders or official requests
- **Technical Issues:** For troubleshooting (only with express consent)

10.5 Fraud Prevention

Cultioo reserves the right to review message contents on a risk basis when:

- There is reasonable suspicion of fraud
- Users are pushed to external payments (platform circumvention)
- Violation of terms of use occurs
- Illegal activities are suspected

Proportionality: Monitoring only occurs with concrete cause. No systematic or automated monitoring of all messages. Strict internal policies and access controls apply.

10.6 Classification as Sensitive Data

Message contents are classified as Sensitive Personal Information (SPI) under CCPA/CPRA as they contain private communication.

10.7 Deletion of Messages

You can request deletion of your entire message history at any time (see Section 15.3).

11. Location Data (Pickup Location)

11.1 Use of Location Data

The Cultioo Business App requires specification of a precise pickup location in the product listing's Transport Matrix to enable product pickup by Delvoo™ Driver. Addresses entered during listing creation are automatically converted to GPS coordinates for route calculation.

11.2 Data Minimization and Purpose Limitation

IMPORTANT PRIVACY NOTICE:

- Location data is used **exclusively** for the pickup process
- **No** permanent tracking of your location
- **No** profiling or behavioral analysis
- **No** sharing with third parties (except Delvoo™ Driver for pickup)

11.3 Control Over Location Data

You have complete control:

- You manually enter the pickup location during listing creation – no automatic GPS tracking
- You can change the pickup location for each transaction
- Location data is deleted after delivery completion

11.4 Classification as Sensitive Data

Precise location data is classified as Sensitive Personal Information (SPI) under CCPA/CPRA and enjoys enhanced protection.

11.5 Privacy by Design

This limited use of location data corresponds to "Privacy by Design" principles and minimizes risks to your privacy.

12. Seller Account and Settings

12.1 Account Management

In your seller account you can manage the following data:

Master Data:

- Name/username
- Business name
- Email address
- Phone number
- Business address

Payment Information:

- Bank accounts (via Stripe)
- Payout settings and schedule (Daily / Weekly / Monthly / Manual)
- Tax forms (W-9, W-8BEN)

Product Management:

- Product listings (title, description, images, prices, regulatory compliance data)
- Live editing of product details – price adjustments, inventory changes, specification updates – without deactivating the listing
- Inventory management (Online / Active listings and Drafts in staging)

Business Profile:

- Corporate Profile Picture or Logo
- Company Name and Official Website
- Professional Description

12.2 Corporate Groups – Three-Tier Role System

The Cultioo Business App supports organizational hierarchy for industrial facilities, warehouses, and large-scale merchant operations. Each seller account is restricted to one active group membership.

Role	Data Access	Description
Admin (Group Founder)	Full dashboard access	All revenue from group members consolidated to Admin's verified account. Authority to download all consolidated invoices and financial reports. Configures Order Approval Protocol.
Member (Sales & Inventory)	Listing and order management	Responsible for listing products and managing inventory. Financial settlement governed by Admin configuration.
Operator (Gatekeeper)	Scanner interface only	Authorized to use the gate verification workflow. No access to financial or administrative data.

Note on Data Segregation: Operator-role users have access exclusively to order data required for gate verification. They cannot access financial dashboards, payout histories, or corporate account settings.

12.3 Modification of Personal Data

Security Measure: Changes can only be made by you yourself via the app. This prevents unauthorized changes by third parties.

Independent Correction: You can correct your data yourself at any time to exercise your right to rectification.

12.4 Account Deletion

Security Procedure: If you wish to delete your account:

1. Navigate to account settings
2. Select "Delete Account"
3. Enter your password for confirmation
4. Confirm final deletion

Irrevocable Deletion:

- After confirmation, all operational account data is permanently and irrevocably removed from the database
- Recovery is not possible

Exceptions: Certain data (transaction records, tax forms) must be retained for a limited period (up to 10 years) due to legal retention obligations. This data is locked and retained only for compliance purposes.

12.5 Password Change

Security Procedure: When creating a new password, the old password must be entered for confirmation. This prevents unauthorized password changes.

Recommendations:

- Use a strong, unique password
 - Change your password regularly
 - Never share your password with third parties
-

13. Data Sharing with Third Parties

13.1 Principle: No Sharing for Advertising Purposes

Cultioo does not share your personal data with third parties for advertising or marketing purposes.

13.2 Disclosure to Buyers

Necessary for transaction processing – buyers see the following seller information:

Data	Purpose
Name/username	Seller identification
Phone number	Emergency contact
Email address	Communication

For High-Volume Sellers (INFORM Act): Additional disclosure required – see Section 17 for full details.

Legal Basis: Contract performance, buyer protection, legal requirements.

13.3 Sharing with Service Providers

a) Delvioo™ (Logistics)

Field	Details
Data Shared	Name, pickup location, contact details
Purpose	Product pickup and delivery
Contractual Safeguards	Service Provider Agreement – data used exclusively for pickup purposes

b) Stripe Inc. (Payment Processing)

Field	Details
Data Shared	Bank accounts, tax forms, payment history
Purpose	Payout of proceeds, tax compliance
Special Note	Stripe is partially independent controller for compliance activities

c) IT Service Providers

Field	Details
Data Shared	All data stored in the app (depending on service provider)
Purpose	Hosting, maintenance, IT security, analytics
Contractual Safeguards	Service Provider Agreements under CCPA/CPRA
Examples	Cloud hosting (e.g., AWS, Google Cloud), analytics tools (e.g., Google Analytics), email services, customer support platforms

13.4 Disclosure to Authorities

Cultioo is obligated to disclose data upon lawful request to:

- **Tax Authorities (IRS):** Tax forms and transaction data
- **Law Enforcement:** In response to court orders or subpoenas
- **Regulatory Authorities:** To fulfill regulatory requirements (FDA, USDA, FTC, etc.)

Transparency: Cultioo will inform you about such requests, if legally permissible.

13.5 Disclosure in Corporate Transactions

In the event of a merger, acquisition, or sale of assets, your data may be transferred as part of the transaction to the successor entity.

- **Obligation:** The successor will be obligated to continue to comply with this Privacy Policy.
 - **Notification:** You will be informed in advance of such a transaction.
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14. Sale and Sharing of Personal Information

14.1 No Sale or Sharing (CCPA/CPRA Statement)

Cultioo does NOT sell or share your personal information.

Based on current business practices, Cultioo expressly confirms:

- Cultioo does not sell personal information (including sensitive personal information) as defined by CCPA/CPRA
- Cultioo does not share personal information for purposes of cross-context behavioral advertising

14.2 Definitions

"Sale" means: The disclosure of personal information to third parties for monetary or other valuable consideration.

"Sharing" means: The disclosure of personal information for purposes of cross-context behavioral advertising.

14.3 Exceptions (Not Sales)

The following data disclosures are **NOT** considered "sale" or "sharing":

- Sharing with Service Providers for contract performance
- Disclosure to buyers for transaction processing
- Sharing with authorities to fulfill legal obligations
- Transfer in corporate transactions

14.4 Future Changes

Should Cultioo introduce practices in the future that could be considered "sale" or "sharing":

- You will be clearly informed in advance
 - A "Do Not Sell or Share My Personal Information" link will be provided
 - You will have the right to opt out of the sale or sharing
-

15. Your Privacy Rights

Depending on your state of residence, sellers in the US have specific legal rights regarding their personal data. Cultioo grants these rights to all sellers to ensure a uniformly high privacy standard.

15.1 Right to Know / Right of Access

You have the right to request that Cultioo disclose:

- Which categories of personal information were collected about you
- From which sources the data originated
- For which business purposes the data was collected
- To which categories of third parties the data was disclosed
- The specific personal information that Cultioo has stored about you

Time Period: The disclosure relates to the preceding 12 months.

Frequency: You can exercise this right up to twice within 12 months free of charge.

15.2 Right to Correct

You have the right to request correction of inaccurate personal data.

Independent Correction: You can correct your data yourself at any time via the app – navigate to account settings, modify the desired information, and save changes.

15.3 Right to Delete

You have the right to request deletion of your personal data.

Independent Deletion: You can delete your account independently at any time via the app (see Section 12.4).

Exceptions to Right to Delete: Cultioo may deny deletion if retention is necessary for:

- Completing the transaction
- Detecting security incidents, fraud prevention
- Debugging
- Fulfilling legal obligations (e.g., IRS retention periods: 10 years)
- Internal use reasonably aligned with your expectations
- Asserting or defending legal claims

Procedure After Account Deletion: Data that must be retained due to legal retention obligations is locked (restricted) and retained only for compliance purposes. It is permanently deleted after expiration of the legal period.

15.4 Right to Limit Use of Sensitive Data

You have the right to direct Cultioo to limit the use of your sensitive personal information to what is necessary to provide services.

Cultioo's SPI Practices:

a) Financial Account Information:

- Managed exclusively by Stripe
- Cultioo only stores tokens



- Use strictly limited to payout purposes

b) Tax Identification Numbers:

- Use exclusively for IRS reporting
- No other use

c) Precise Pickup Location:

- Use exclusively for product pickup
- No permanent tracking or profiling

d) Message Contents:

- Access only for sender and recipient
- Cultioo access only in case of fraud suspicion

A "Limit the Use of My Sensitive Personal Information" link is available in app settings.

15.5 Right to Opt-Out of Sale or Sharing

Cultioo currently does not sell or share personal information. An opt-out is therefore not required.

Future Commitment: If Cultioo introduces such practices, a "Do Not Sell or Share My Personal Information" link will be provided.

15.6 Right to Data Portability

You have the right to receive your personal data in a structured, machine-readable format (e.g., JSON, CSV). Contact us to request a copy of your data.



15.7 Right to Non-Discrimination

Cultioo expressly commits: **You will NOT be discriminated against for exercising any of your privacy rights.**

This means:

- You will not be denied service
- You will not be charged different fees or commissions
- You will not be provided a lower quality of services
- You will not be treated differently

15.8 Exercising Your Rights

Submitting a Request: You can exercise your privacy rights through the following channels:

- **Online Request Portal:** cultioo.com
- **Email:** privacy@cultioo.com
- **Mailing Address:** Cultioo Inc., Attn: Privacy Rights Department, 8 The Green, Ste A, Dover 19901, United States

Verification Process: To protect the security of your data, Cultioo must verify your identity:

- We match your information with our records
- For sensitive requests, additional verification steps may be required
- You can authorize a representative (written authorization required)

Response Time: Cultioo will process your request within **45 days**. In complex cases, this period may be extended by an additional 45 days (with notification).

Free of Charge: Exercising your privacy rights is free of charge.

16. Retention Period and Deletion

Cultioo stores personal data only as long as necessary for processing purposes or to comply with legal retention requirements.

16.1 Retention Period by Category

Data Category	Retention Period	Justification
Account Data (operational)	Until account deletion	Necessary for service provision
Product Listings	Until removal or account deletion	Active sales activity
Transaction Data	10 years from transaction date	IRS requirements, tax retention obligations
Tax Forms (W-9, W-8BEN)	10 years from submission	IRS regulations, audit periods
Message History	Until account deletion or upon request	Transaction processing, dispute resolution
Financial Data (at Stripe)	According to Stripe policies	Outside Cultioo's control
Technical Usage Data	12–24 months	Security, analytics, debugging
Pickup Location Data	Until delivery completion	Exclusively for pickup process

16.2 Conflict: Right to Deletion vs. Retention Obligations

Problem: The right to deletion may conflict with legal retention obligations.

Solution Through Data Restriction:

When you delete your account, but data must be retained due to legal obligations:

- **Operational data is deleted:** Account data no longer needed is permanently removed
- **Compliance data is locked:** Transaction data and tax forms are:
 - Locked for operational purposes (no longer accessible to you or Cultioo staff for ordinary use)
 - Retained only for compliance purposes (e.g., IRS audits)
 - Permanently deleted after expiration of the legal period

Legal Retention Periods:

- IRS (Internal Revenue Service): Up to 10 years for tax records
- Commercial regulations: Up to 7 years for business records
- **Highest Standard:** Cultioo applies the 10-year period to meet all requirements

16.3 Deletion After Purpose Fulfillment

After expiration of the retention period, data is securely deleted or anonymized. Cultioo uses secure deletion methods that prevent recovery.

17. INFORM Consumers Act Compliance

17.1 Overview of the INFORM Consumers Act

The INFORM Consumers Act (15 U.S.C. § 45f) is a US federal law that requires online marketplaces to collect, verify, and disclose information about high-volume sellers.

Purpose: Protection of consumers from fraudulent sellers.

17.2 Definition of High-Volume Seller

You are considered a high-volume seller if, in any consecutive 12-month period within the last 24 months, you have:



- Made **200 or more** discrete sales of new or used consumer products; **AND**
- Earned **\$5,000 or more** in gross revenues from these sales

17.3 Collected and Verified Information

For high-volume sellers, Cultioo collects and verifies:

Identity Information:

- Full legal name (or business name)
- Business tax identification number (EIN) or Social Security number (SSN)
- Current email address and phone number

Business Address:

- Complete physical business address
- Copy of government-issued photo ID
- Tax identification number
- Bank account information

17.4 Disclosure to Consumers

Cultioo makes the following information visible to buyers:

Disclosure Option	What Is Shown
Full Disclosure (standard)	Full name or business name, complete physical address, contact information (email and phone number)
Partial Address (if seller uses private address)	Country, State, City, ZIP code — plus full name and contact information

17.5 Seller Consent

By accepting this Privacy Policy, you consent to:

- The collection and verification of your identity and business information

- The disclosure of required information to buyers
- Regular review of your information (at least annually)

If you become a high-volume seller: Cultioo will notify you and collect and disclose the required information.

17.6 Reporting Suspicious Activities

Buyers can report suspicious or fraudulent seller activities to:

Cultioo Trust & Safety Department

Email: privacy@cultioo.com

Cultioo will investigate reports and suspend or terminate seller accounts as needed.

18. Tracking Technologies and Cookies

18.1 Use of Tracking Technologies

The Cultioo Business App may use technologies that store information locally on your device or access it (e.g., cookies, local storage, session storage).

18.2 Types of Tracking Technologies

Type	Purpose	Legal Basis	Duration
Technically Necessary Cookies	Enable basic functions (session login, storage of settings, shopping cart functionality)	Contract performance (technically necessary)	Until session end or up to 12 months
Analytics Cookies	Analysis of app usage for improvement (e.g., Google)	Consent or legitimate interest	Up to 12 months



Type	Purpose	Legal Basis	Duration
	Analytics, Firebase Analytics)		

For non-technically necessary analytics tools, Cultioo obtains your active consent.

18.3 Cookie Control

You can adjust your cookie settings at any time:

- Via app settings
- Via your device
- By deleting cookies

Note: Disabling certain cookies may limit app functionality.

18.4 Do Not Track (DNT)

Current Position: Cultioo currently does not honor traditional Do Not Track (DNT) browser signals, as there is no uniform industry standard.

18.5 Global Privacy Control (GPC)

Commitment to Recognition: In compliance with CCPA/CPRA, Cultioo commits to recognizing the Global Privacy Control (GPC) signal as a valid opt-out request for sale or sharing of personal information.

19. Changes to This Privacy Policy

19.1 Right to Make Changes

Cultioo reserves the right to update this Privacy Policy as needed to adapt it to changed legal requirements or business practices.

19.2 Notification of Changes

Material changes will be communicated to you through:

- In-app notification
- Email to your registered email address
- Prominent notice at next login

19.3 Effective Date

The current version of this Privacy Policy took effect on **January 1, 2026**.

19.4 Review Recommendation

We recommend that you periodically review this Privacy Policy to stay informed about changes.

19.5 Continued Use

Your continued use of the app after changes constitutes acceptance of the updated Privacy Policy.

20. Contact Information

For questions, complaints, or to exercise your rights regarding your personal data, you can contact us through the following channels:



20.1 General Inquiries

Cultioo Inc.
A Delaware Corporation
8 The Green, Ste A
Dover, DE 19901
United States of America

Email: support@cultioo.com

20.2 Privacy-Specific Inquiries

Privacy Department
Email: privacy@cultioo.com

20.3 Online Request Portal

https://cultioo.com/en/en_cultioo_business_app_info#privacy

20.4 Mailing Address

Cultioo Inc.
Attn: Privacy Rights / Legal & Compliance Department
8 The Green, Ste A
Dover, DE 19901
United States of America

20.5 Response Time

Request Type	Response Time
Privacy Rights Requests	45 days (may be extended to 90 days for complex requests)
General Inquiries	5–7 business days



Privacy Policy
Cultioo Business App
United States

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Governing Entity: Cultioo Inc., a Delaware Corporation