

## **Avenews' Platform Privacy Policy**

Last Revised: June 17, 2021

We, Avenews-GT Inc. and our affiliates (collectively, “Avenews”, “Company” “we” or “us”) respect the privacy of the users of our online platform, available at <https://kenya.avenews.io/login> (the “Site”) and through our mobile application (the “App” and respectively, “you” or the “User”). The Site and the App shall be referred to collectively as the “Platform”. We believe that you have a right to know our practices regarding the information we may collect and use when you visit and/or use our Platform, and we are committed to protecting the personal information that you share with us.

Capitalized terms which are not defined herein, shall have the meaning ascribed to them in our Terms of Use at [<https://agt-files-prod.s3.us-east-2.amazonaws.com/kenya-Terms-of-use.pdf>] (“Terms of Use”), into which this Privacy Policy is incorporated by reference.

You hereby acknowledge that this Privacy Policy governs your use of the Platform. Additionally, the Company maintains a website serving mainly as an informative marketing tool, available at: <https://www.Avenews.com/>. This website is governed by its applicable Privacy Policy available at: <https://www.Avenews.com/copy-of-apply-as-a-seller>.

Please note that some of the personal information which we collect and process about you may be provided to us by agri-businesses with which you are associated (“Agri-business(es)”). For example, if you are a member of a cooperative and/or joined our Platform via a cooperative, such cooperative constitutes an Agri-business for the purposes of this Privacy Policy and we may receive certain personal information relating you directly from the cooperative.

### **1. Your Consent (PLEASE READ CAREFULLY!)**

This Privacy Policy details how your Personal Information (as defined below) is used and processed by Avenews, or on its behalf, in the context of your use of the Platform.

BY ENTERING, CONNECTING TO, ACCESSING OR USING THE PLATFORM, YOU ACKNOWLEDGE THAT YOU ARE OR HAVE HAD THE OPPORTUNITY TO BECOME AWARE OF AND AGREE (IN JURISDICTION WHERE SUCH CONSENT IS REQUIRED) TO THIS PRIVACY POLICY AND AVENEWS' PRACTICES DESCRIBED HEREIN, INCLUDING THE PROCESSING (INCLUDING COLLECTING, USING, DISCLOSING, RETAINING OR DISPOSING) OF YOUR PERSONAL INFORMATION UNDER THE TERMS OF THIS PRIVACY POLICY.

### **2. Which information we may collect on our Users?**

We may collect two types of data and information from our Users:

- a. **Non-personal Information**. The first type is non-identifiable and anonymous information. Non-personal information, which is being gathered, consists of technical information and behavioral information that does not pertain to a specific individual (“Non-Personal Information”).

Like most online services, when you access and use the Platform we passively collect certain Non-Personal Information from your devices (depending on whether you access the Platform via our Site or App), including: (i) technical information such as the type and version of your device and its operating system, the type of browser, screen resolution, device browser and keyboard language, Wi-Fi connectivity and the type and name of your device and/or browser, etc.; and (ii) behavioral information which may include the User’s click-stream on the Platform, the activities of the User on the Platform and additional information of a similar nature (collectively, “Technical and Behavioral Information”). We may use third-party service providers to obtain detailed analytics on the device and the User's behavior on the Platform. Please note that we or our third-party service providers will collect such Technical and Behavioral Information by using certain tracking technologies, such as cookies, as further detailed below.

- b. **Personal Information**. The second type of information is individually identifiable information (“Personal Information”). **This information may identify an individual or may be of a private and/or sensitive nature.**

**Personal Information which is provided voluntarily:**

- **Communications with Avenews:** Personal Information you provide us as part of any communications with Avenews, by any means, including by contacting us via the Site and/or Platform or email, approaching our customer services or during sales calls or through our social network pages (such information may include marketing and communication data that includes your preferences in receiving marketing from us and your communication preferences). Please note that we may record calls for quality assurance purposes and in order to improve our services.
- **Account details:** when registering to use, and signing into, the Platform we will collect your username and password, which constitute Personal Information.
- **Payment details:** in certain cases, either you or an Agri-business that you are associated with, may provide us with certain payment details, such as bank account numbers. Such information shall be used to facilitate the transfer of payments to you, or by you to third parties. To the extent that you provide us with payment details of third parties, you warrant that you have obtained such information lawfully and that you received all required consents to provide us with such information.
- **Registration to the Platform:** Personal Information is collected from the details the Users provide in the registration form available on the Platform (which enables the Users to open an Account), which includes, *inter alia*, name, email, country and telephone number, identification number (ID), job title, company's registered name and number, address, a profile photo name, business name, email address and phone number. Additional information may be requested in the future. Personal Information may be collected from the details you may provide us in respect to your service provider, customers and affiliates, which includes their email address and telephone number (which enables us to open an Account on their behalf).
- **User Generated Content:** Personal Information includes any data and/or content, including User Generated Content (as such term is defined in our Terms of Use), that you may upload or generate through use of the Platform and the Service. Such information may include, for example, information related to orders, clients, ecosystems, invoices, and products, client contact details and documents. Furthermore, such information may include personal information relating to you, which Agribusinesses have uploaded to the Platform.

**Please note: as part of your use of the Platform, you may upload to the Platform Personal Information which relates to third parties, such as customers, affiliates, farmers, family members, suppliers and service providers. When you upload Personal Information which relates to any third party to the Platform, you represent and warrant that you have provided such third party with a copy of this Privacy Policy and received such third party's consent to the uploading of his/her Personal Information to the Platform.**

#### **Sensitive Information.**

- Please note that some of the information that you upload to the Platform is of a sensitive nature and may constitute "Sensitive Information", as such term is defined under certain data protection laws. Please note that we have put in place technical and organizational measures to ensure that such data is processed securely and in confidence. Such information includes primarily:
  - Information relating to your assets and financial status (including your earnings, expenses and possessions and including financial reports uploaded to the Platform);
  - Information relating to payments made via the Platform (e.g., payments made to you by Agri-businesses);
  - Information relating to your family members, including your spouse and children.

#### **Personal Information collected from third parties.**

- Please note that we may receive Personal Information which relates to you from related third parties, namely Agri-businesses. For example, when our Users take part in a cooperative business, we may

receive Personal Information which relates to such Users directly from the cooperative itself. Such Personal Information will be uploaded to the Platform and may be included in the User's profile on the Platform.

- We also obtain information from other sources, which may include, but not limited to, publicly-available sources, information provided by third parties which helps us determine your location based on your IP address and data providers, such as Google Analytics, from which we obtain demographic, interest based and online advertising related data.

#### **Personal Information collected via technology:**

- **IP/MAC Address:** users of the Platform may automatically provide their IP address (or Mac Address, as applicable) and/or advertiser identifier (when available on a device) mainly for enhancing the User's experience and for geo-location and security purposes as further detailed below.
- **Geolocation data:** while using the Platform we will access, collect, process, monitor and/or remotely store "geolocation data", including through the collection of GPS coordinates and IP analysis, to determine your location, in order to provide you our services, and for analytics and security purposes.
- **Technical and Behavioral Information:** to the extent that the Technical and Behavioral Information detailed above under Section 2.1 will be linked to or associated with a specific individual then such information will be considered as Personal Information.
- **Identifiers:** while using the platform we may collect certain unique identifiers, such as Internet Protocol (IP) address, your Unique Device Identifier (UDID), or other unique identifiers for security purposes and analytics and in order to provide you with our services via the Platform.

For avoidance of doubt, any Non-Personal Information connected or linked to any Personal Information shall be deemed as Personal Information as long as such connection or linkage exists.

**We do not collect any Personal Information from you or related to you without your approval, which is obtained, inter alia, through your active acceptance to the Terms of Use and the Privacy Policy.**

## **2. How Do We Collect Information on Our Users?**

There are two main methods we use:

- We collect information through your entry, connection, installation, access and/or use of Platform.** In other words, when you are using the Service we are aware of it and may gather, collect and store the information relating to such usage.
- We collect information which you provide us voluntarily.** For example, we collect Personal Information when you register and open an Account, interact with other Users and upload User Generated Content.
- We collect information from third party sources.** We may collect Personal Information relating to you from Agribusinesses, as well as supplement personal information that we collect about you with information which you have made public or from third party sources.

We may gather, collect and store such information either independently or through the help of our authorized third-party service providers as detailed below.

## **3. What are the Purposes of the Collection of Information?**

We collect Non-personal Information and Personal Information in order to operate the Platform and provide the Service.

Non-personal Information is collected in order to:

- Use it for statistical and research purposes and for customization and improvement of our Service.

- Provide and improve the Service for our commercial purposes.
- Improve the quality of the Service by formulating, customizing and enhancing the User's experience.

Personal Information is collected in order to:

- Enable the overall operation of the Platform.
- Personalize your experience on the Platform.
- Provide you with third-party direct marketing via the Platform.
- Improve the quality of the Service by formulating, customizing and enhancing the User's experience.
- Allow us to contact Users with proposals and tailored information regarding new products, events, offers, services, features, enhancements, special offers, upgrade opportunities, and events of interest etc.
- Send push notifications to the User's device after the User has agreed to accept push notifications from Avenews. Users can deactivate push notification by changing their settings within our Service.
- Verify the User's identity when he/she signs in to the Service, as well as verifying User's identity for the purpose of dealing with inappropriate interactions of User and/or fraudulent use of our Service.
- Be able to contact Users for the purpose of providing them with technical assistance and support.
- Keep the Site safe and secured and for prevention of fraud and crime;
- Maintain our data processing records and general administrative purposes;
- Determine general geo-location information (i.e., country) from which the User's computer is connected to the Internet in order for us to know the general location of our Platform's Users as well as in order to safeguard our Platform.

**Legal Basis for processing:** In order for Avenews to process your Personal Information, as detailed herein, such processing must be justified by a "basis" for processing. Please note that the Personal Information processing activities detailed herein may be justified on the basis that:

- the processing is necessary for performance of a contract or in order to take steps prior to entering into a contract – other than as stated below, we process all of the Personal Information detailed under Section 2 above, solely in order to enable you to use the Platform and our Services. As such, Personal Information is processed on the basis of performance of the contract between you and Avenews, namely our Term of Use;
- the processing is based on your consent - where you provide us with your consent to contact you for marketing purposes or when we use cookies to collect information about your use of the Site, you will be asked to consent to such activities before we can process such information. If you choose not to give us your consent for such processing activities, or if you decide later to remove your consent, this may affect our ability to provide you with some of the services available on our Platform;
- the processing is necessary to comply with a legal obligation - we may process your Personal Information for disclosure of information to authorities; and
- the processing is in our legitimate commercial interests - subject to your interests and fundamental rights, under our legitimate interest in marketing our products and services via the Site and offering the public comfortable and safe access to our Platform, we shall perform the Personal Information processing activities described herein, such as the processing of your Personal Information in order to personalize the Platform, assisting us to prevent crime and fraud, manage our internal operations, maintaining records and email tracking. We may also use the information contained in certain cookies and other such files or tags based on such ground for our legitimate interests in a safe and user-friendly presentation of our Platform. Where we rely on legitimate interests as a lawful basis, we

will carry out a balancing test to ensure that your interests, rights and freedoms do not override our legitimate interests.

#### **4. Sharing Information with Third Parties**

**Avenews will share Personal Information it collects to the extent that such disclosure is required for operating the Services offered via the Platform. Some of the Personal Information collected from you via the Platform will be disclosed, to the extent required, in the following circumstances:**

- **to other Users that you choose to interact with via the Platform, including Agribusinesses;**
- **to third parties for the purpose of offering you tailored direct marketing via the Platform;**
- **providing you with third party services, such as financial services, and offers to receive such services, if applicable; and/or**
- **with any third-party business with which you may be associated with via the Platform (for example, when you onboard to the Platform via an Agribusiness, we may share your Personal Information with such Agribusiness).**

Notwithstanding, Avenews may share Personal Information in the following cases: (a) to satisfy any applicable law, regulation, legal process, subpoena or governmental request; (b) to enforce this Privacy Policy and/or the Terms of Use, including investigation of potential violations thereof; (c) to detect, prevent, or otherwise address fraud, security or technical issues; (d) to respond to User's support requests; (e) to respond to claims that any content available on the Platform violates the rights of third-parties; (f) to respond to claims that contact information (e.g. name, e-mail address, etc.) of a third-party has been posted or transmitted without their consent or as a form of harassment; (g) to protect the rights, property, or personal safety of Avenews, its Users, or the general public; (h) when Avenews is undergoing any change in control, including by means of merger, acquisition or purchase of all or substantially all of its assets; (i) to collect, hold and/or manage your Personal Information through Avenews' authorized third parties service providers (including, as applicable, their affiliates as necessary to provide us with the requested services), as reasonable for business purposes, which may be located in a country that does not have the same data protection laws as your jurisdiction; (j) to store or process your Personal Information through Avenews' affiliated companies, which may be located in a country that does not have the same data protection laws as your jurisdiction. Avenews requires its affiliated entities to agree to processing your Personal Information in compliance herewith; (k) cooperate with third parties for legitimate business purposes, including without limitation, enhancing the User's experience; and/or (l) pursuant to your explicit approval prior to the disclosure.

**Please note that to the extent permitted under applicable law, all disclosures of Personal Information to third parties outside the Platform shall be subject to the recipient's undertaking of confidentiality and obligations to properly secure the Personal Information and to use it solely for the purpose for which it was disclosed, and that all transfers of Personal Information over public networks shall be encrypted. Furthermore, we have implemented in the Platform, where appropriate, certain measures intended to inform you and seek your consent for transfers of personal information to third parties (such as financial institutions) outside the Platform.**

For avoidance of doubt, Avenews has the unrestricted right to use Non-personal Information for any purpose and to transfer and disclose Non-personal Information to third parties at its own discretion.

#### **5. Social Features**

Our Platform may include social media features (“**Social Features**”). The Social Features are operated or allow for social integration with certain third-party social networks or third party platforms (“**Social Network**”). These Social Networks are created and maintained by third parties who are not affiliated with and/or controlled by Avenews. If you enable this integration with such Social Networks, your use of the

Social Features is subject to the applicable third-party Social Network's terms of use and privacy policies. You should ensure that you read their terms of use and privacy policies to understand how they treat your information and in order to understand the methods for changing the privacy or sharing settings on such services. If you do not agree to the practices described in such terms you should not allow the Platform to interact with such Social Networks, however you may find that you are not able to enjoy all the features that may be made available via the Platform. You understand that where you allow interaction with any third-party Social Network, we may share data about you with your contacts (and vice versa) in order that you may enjoy social elements. This data may include, without limitation, your name and your social media profile picture. By using the Social Features you hereby agree and understand that the applicable Social Networks or Platforms may collect certain Personal Information, such as your IP address, Non-personal Information and may set cookies and/or other web tracking technologies to enable the functionality of the Social Features. The use of such features enables the sharing of information with your friends or the public, depending on the settings you establish with the third party that provides the Social Features. You hereby understand and agree that when you share content via Social Networks that your content may become public and others may re-post-it.

## **6. Deletion or Modification of Personal Information**

Avenews acknowledges you may have certain right under applicable law with respect to the Personal Information that we process about you. We hereby inform you of the following rights, in respect of your Personal Information:

- **Right to access:** you may have the right to request a review of your Personal Information held by Avenews. We may refuse to comply with your access request if the request is manifestly unfounded, excessive or repetitive in nature.
- **Right to rectification:** if the Personal Information processed by Avenews is incorrect, incomplete or not processed in compliance with applicable law or this Privacy Policy, you may have the right to have your Personal Information rectified.
- **Right to erasure:** under certain conditions, you may be entitled to require that Avenews will delete or "block" your Personal Information (e.g. if the continued processing of those data is not justified).
- **Right to Portability:** you may have the right to transfer your Personal Information between data controllers (i.e. to transfer your Personal Information to another entity). The right to data portability only applies where your Personal Information is processed by us with your consent or for the performance of a contract and when processing is carried out by automated means.
- **Right to object to or withdraw consent:** where that lawful basis for processing your Personal Information is either "public interest" or "legitimate interests", those lawful bases are not absolute, and you may have a right to object to such processing. Where you object on grounds of legitimate interest, we shall no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims. If the processing of your Personal Information is based on your consent, you have the right to withdraw your consent to such processing at any time.
- **The right to restrict processing:** under certain circumstances, you may have the right to object to the processing of your Personal Information due to your particular situation.
- **Right to lodge a complaint:** you have the right to lodge a complaint before the relevant data protection authority or supervisory authority of your jurisdiction.

To exercise these rights, where applicable, please contact us by sending an email to: [office@Avenews.com](mailto:office@Avenews.com).

## **7. Minors**

The Platform are intended for Users over the age of eighteen (18). Therefore, Avenews does not intend and does not knowingly collect Personal Information from minors under the age of eighteen (18) and does not

wish to do so. We reserve the right to request proof of age at any stage so that we can verify that minors under the age of eighteen (18) are not using the Platform. If we learn that we collected Personal Information from minors under the age of eighteen (18) we will delete that information as quickly as possible. Please contact Avenews at [office@Avenews.com](mailto:office@Avenews.com) if you have reasons to suspect that Avenews collected Personal Information from minors under the age of eighteen (18) and we will delete that information as quickly as possible.

## **8. Security**

We take reasonable measures to maintain the security and integrity of our Platform and your information and prevent unauthorized access to it or use thereof through generally accepted industry standard technologies and internal procedures. Please note, however, that there are inherent risks in transmission of information over the Internet or other methods of electronic storage and we cannot guarantee that unauthorized access or use of your Personal Information will never occur.

Amongst others, we operate the Platform through reputable vendors that ensure a high level of data security, ensure 2FA is in place, encrypt personal information at transit and in rest, maintain technical and organizational measures to ensure that the data is maintained secure, ensure that our personnel undergo regular training and are under a duty of confidentiality and perform regular tests and audits to ensure our compliance with applicable data protection laws and market security standards.

## **9. Third Party Service Providers**

While using the Platform we may be using third party service providers, who may collect, store and/or process your Personal Information, as detailed in this Privacy Policy. Note, that we collect, hold and/or manage your Personal Information through our authorized third party vendors of certain products or services (such as hosting cloud services) (including, as applicable, their affiliates) solely and limited to providing us with such requested services, and not for any other purposes.

Such third party service providers include the following service providers:

- Amazon Web Services (AWS) which privacy policy can be found at [https://aws.amazon.com/privacy/?nc1=f\\_pr](https://aws.amazon.com/privacy/?nc1=f_pr),
- Google Analytics which privacy policy can be found at <https://policies.google.com/privacy?hl=en>, and
- Hotjar which privacy policy can be found at <https://www.hotjar.com/legal/policies/privacy>.

## **10. International Data Transfer**

The information collected from you, as detailed in this Privacy Policy, may be transferred to, processed and stored by Avenews and/or its service providers on servers and by staff which may be located in countries outside of your jurisdiction, namely in the European Union, in Israel and in the United States.

Avenews is committed to protecting your Personal Information and will take appropriate steps to ensure that your Personal Information is processed and stored securely and in accordance with applicable privacy laws, as detailed in this Privacy Policy. Such steps include putting in place data transfer agreements or ensuring our third-party service providers comply with our data transfer protection measures.

BY SUBMITTING YOUR PERSONAL INFORMATION THROUGH THE PLATFORM, YOU ACKNOWLEDGE, AND CONSENT, TO SUCH TRANSFER, STORING AND/OR PROCESSING OF PERSONAL INFORMATION.

## **11. Data Retention**

Avenews will retain the Personal Information for as long as your Account to use Platform is active and for a period of 7 years thereafter, for archiving purposes, to defend against potential legal claims and to comply with our legal obligations. Personal Information which is no longer required for the purpose for

which is was initially collected will be deleted unless we have a valid justification to retain it which is permitted under applicable law, such as to resolve disputes or comply with our legal obligations.

## **12. Links to Third Party Websites**

Certain links provided herein permit our Users to leave the Platform and enter non-Avenews sites or services. Those linked sites and services are provided solely as a convenience to you. These linked sites and services are not under the control of Avenews and it is not responsible for the availability of such external sites or services, and does not endorse and is not responsible or liable for any content including but not limited to content advertising, products or other information on or available from such linked sites and services or any link contained in linked sites or service. In addition, Avenews is not responsible or liable for such linked sites and services' privacy practices and/or any other practices. Your access to, use of and reliance upon any such sites, services and content and your dealings with such third parties are at your sole risk and expense. Avenews reserves the right to terminate any link at any time. You further acknowledge and agree that the Company shall not be responsible or liable, directly or indirectly, for any damage or loss caused or alleged to be caused, by or in connection with use of or reliance on any services, content, products or other materials available on or through such linked sites or resource. Most of such linked sites and services provide legal documents, including terms of use and privacy policy, governing the use thereof. It is always advisable to read such documents carefully before using those sites and services, *inter alia*, in order to know what kind of information they are collecting.

## **13. Cookies and Other Tracking Technologies**

When you access or use the Platform, Avenews and/or our third party service providers may use industry-wide technologies such as “cookies” or other similar technologies, which store certain local information on your device or on the Site (“**Cookies**”), which may enable, *inter alia*, automatic activation of certain features and make the User’s experience and usage simpler, more relevant, convenient and effortless. Such information is locally stored on your computer or on your device. Avenews and/or our authorized third party service providers may access such information. Avenews and/or our authorized third party service providers may use both session cookies (which expire once you close the Platform) and persistent cookies (which stay on the User’s device until he/she deletes them). Such Cookies included in the Service may store non-personal information (such as the different pages viewed by a User within the Platform) as well as User persistent identifier, which will be collected in accordance with the terms specified herein. It is easy to prohibit and/or delete the Cookies, *inter alia*, via uninstalling the App from your mobile device and/or through the Settings option of your device. Most platforms will allow you to erase cookies from your computer's hard drive or from you device, block acceptance of cookies, or receive a warning before a cookie is stored. In order to erase or disable the Cookies you may use the settings option of your device or according to the specific instructions provided by the third party service provider's privacy policy and terms of use. However, if you block or erase cookies, or change the settings of your device, your online and/or App experience may be limited.

## **14. Advertisements**

Users may receive advertisements and commercials (including without limitation coupons, discounts, etc.) from third party advertisers and/or our authorized service providers and/or vendors. By clicking the advertisements or commercials you may be transferred to a website of an advertiser or receive any other messages, information or offers from the advertiser and/or from others. Note that if you click on any of these advertisements, these advertisers may use local storage including without limitation cookies and other web-tracking technologies (such as tracking pixel agent or visitor identification technology, etc.) to collect data regarding advertisement performance, your interaction with such ads and our Platform and your interests (which may include, non-personal and/or personal information (such as, device and network information, unique identifiers, gender, age and location) about you) in order to serve you advertisements and for the legitimate business interests of such third parties ad networks. We recommend that you review the terms of use and privacy policy of any advertiser with which you are interacting before doing so. Their privacy policy, not ours, will apply to any of those interactions.



All the information contained in such advertisements and commercials belongs solely to the advertisers and the Company makes no warranties or representations in respect of such, whether or not the Company has control over such advertisements or commercials and these are provided on an “AS IS” basis. In any event, the Company will not be liable for any damage or loss incurred to you as a result of or in connection with such advertisements or commercials. The Company, advertisers and/or related third-parties may be entitled to certain shares of the earnings for such advertisements and/or commercials. You agree, acknowledge and consent that no right, title or interest is or shall be granted to you in any way with respect to any revenue share whatsoever in relation thereto.

#### **15. Direct Marketing**

You hereby agree that we may use your contact details for the purpose of informing you of products, services and other updates and new features which may be of interest to you, as well as for sending you other materials to the e-mail address provided in the registration process. You may withdraw your consent via sending a written notice to Avenews by e-mail to the following e-mail address: office@Avenews.com or alternatively following the instructions for removing yourself from the mailing list which are available in the e-mail transmitted to you.

#### **16. Changes to the Privacy Policy**

The terms of this Privacy Policy will govern the use of the Platform and any information collected with respect thereto. Avenews reserves the right to change this policy at any time, so please re-visit this page frequently. In case of any material change, we will make reasonable efforts to post a clear notice on the Platform and/or we will send you an e-mail (to the extent that you provided us with such e-mail address) regarding such change. Such substantial changes will take effect seven (7) days after such notice was provided on our Platform or sent by e-mail, whichever is the earlier. Otherwise, all other changes to this Privacy Policy are effective as of the stated “Last Revised” date and your continued use of the Platform after the Last Revised date will constitute acceptance of, and agreement to be bound by, those changes. In the event that the Terms should be amended to comply with any legal requirements, the amendments may take effect immediately, or as required by the law and without any prior notice.

#### **17. Got any Questions?**

If you have any questions (or comments) concerning this Privacy Policy, you are most welcome to send us an email to the following address: office@Avenews.com and we will make an effort to reply within a reasonable timeframe.