

**CONFIDENTIAL, INC.**  
**PRIVACY POLICY**

**Effective date:** June 06, 2022.

Thank you for visiting [www.confidential.io](http://www.confidential.io) (the “Site”), owned and operated by Confidential, Inc. (“Confidential,” “we,” or “us”). At Confidential, we take your privacy seriously. Please read this Privacy Policy to learn how we treat your personal data. **By using or accessing our Site or Services in any manner, you acknowledge that you accept the practices and policies outlined below, and you hereby consent that we will collect, use and share your information as described in this Privacy Policy.**

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**1. WHAT THIS PRIVACY POLICY COVERS.**

This Privacy Policy covers important information and disclosures relating to how we treat Personal Data that we gather when you access or use our Site, but does not cover the practices of companies we don’t own or control or people we don’t manage. Please note that you may have additional rights to control the use and disclosure of your Personal Data. Residents of California should refer to the relevant subsections below. You may print a copy of this Privacy Policy by clicking here: [www.confidential.io/PrivacyPolicy](http://www.confidential.io/PrivacyPolicy). If you have a disability, you may access this Privacy Policy in an alternative format by contacting: [privacy@confidential.io](mailto:privacy@confidential.io)

Use of the term “Personal Data” herein means any information that identifies or relates to a particular individual and also includes information referred to as “personally identifiable information” or “personal information” under applicable data privacy laws, rules or regulations.

**2. CATEGORIES OF PERSONAL DATA WE COLLECT.**

This chart details the categories of Personal Data that we collect and have collected over the past 12 months:

<b><u>Category of Personal Data</u></b>	<b><u>Examples of Personal Data We Collect</u></b>	<b><u>Categories of Third Parties With Whom We Share this Personal Data:</u></b>
<b>Profile or Contact Data</b>	<ul style="list-style-type: none"><li>• First and last name</li><li>• Email</li><li>• Phone number</li></ul>	<ul style="list-style-type: none"><li>• Service Providers</li><li>• Parties You Authorize, Access or Authenticate</li></ul>
<b>Device/IP Data</b>	<ul style="list-style-type: none"><li>• IP address</li><li>• Device ID</li><li>• Domain server</li><li>• Type of device/operating system/browser used to access the Site/Services</li></ul>	<ul style="list-style-type: none"><li>• Service Providers</li><li>• Parties You Authorize, Access or Authenticate</li><li>• Analytics Partners</li></ul>
<b>Web Analytics</b>	<ul style="list-style-type: none"><li>• Web page interactions</li><li>• Referring webpage/source through which you accessed the Site/Services</li></ul>	<ul style="list-style-type: none"><li>• Service Providers</li><li>• Parties You Authorize, Access or Authenticate</li></ul>

	<ul style="list-style-type: none"> <li>• Non-identifiable request IDs</li> <li>• Statistics associated with the interaction between device or browser and the Site/Services</li> </ul>	<ul style="list-style-type: none"> <li>• Analytics Partner</li> </ul>
<b>Other Identifying Information that You Voluntarily Choose to Provide</b>	<ul style="list-style-type: none"> <li>• Identifying information in emails or letters you send us</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Parties You Authorize, Access or Authenticate</li> </ul>

Categories of Sources of Personal Data

We collect Personal Data about you from the following categories of sources:

- **You**
  - When you provide such information directly to us.
    - When you use our Site.
    - When you voluntarily provide information in free-form text boxes through the Site or through responses to surveys or questionnaires.
    - When you send us an email or otherwise contact us.
  - When you use the Site and such information is collected automatically.
    - Through Cookies (defined in the “Tracking Tools and Opt-Out” section below).
- **Third Parties**
  - Vendors
    - We may use analytics providers to analyze how you interact and engage with the Site, or third parties may help us provide you with customer support.

Our Commercial or Business Purposes for Collecting Personal Data

- **Providing, Customizing and Improving the Site**
  - Providing you with the products, services or information you request.
  - Meeting or fulfilling the reason you provided the information to us.
  - Providing support and assistance for the Site.
  - Improving the Site, including testing, research, internal analytics and product development.
  - Personalizing the Site, website content and communications based on your preferences.
  - Doing fraud protection, security and debugging.
  - Carrying out other business purposes stated when collecting your Personal Data or as otherwise set forth in applicable data privacy laws, such as the California Consumer Privacy Act (the “CCPA”).
- **Corresponding with You**
  - Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about us or the Site.
  - Sending emails and other communications according to your preferences or that display content that we think will interest you.
- **Meeting Legal Requirements and Enforcing Legal Terms**
  - Fulfilling our legal obligations under applicable law, regulation, court order or other legal process, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities.
  - Protecting the rights, property or safety of you, us or another party.
  - Enforcing any agreements with you.

- Responding to claims that any posting or other content violates third-party rights.
- Resolving disputes.
- **Marketing the Site/Services**
  - Marketing and selling the Site/Services.

We will not collect additional categories of Personal Data or use the Personal Data we collected for materially different, unrelated or incompatible purposes without providing you notice.

### 3. HOW WE SHARE YOUR PERSONAL DATA.

We disclose your Personal Data to the categories of service providers and other parties listed in this section. Depending on state laws that may be applicable to you, some of these disclosures may constitute a “sale” of your Personal Data. For more information, please refer to the state-specific sections below.

- **Service Providers.** These parties help us provide our services or perform business functions on our behalf. They include:
  - Hosting, technology and communication providers.
  - Security and fraud prevention consultants.
  - Analytics providers.
- **Parties You Authorize, Access or Authenticate**
  - Third parties you access through the services.
  - Other users.
- **Analytics Partners.** These parties provide analytics on web traffic or usage of the Site. They include:
  - Companies that track how users found or were referred to the Site.
  - Companies that track how users interact with the Site.

#### Legal Obligations

We may share any Personal Data that we collect with third parties in conjunction with any of the activities set forth under “Meeting Legal Requirements and Enforcing Legal Terms” in the “Our Commercial or Business Purposes for Collecting Personal Data” section above.

#### Business Transfers

All of your Personal Data that we collect may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part). Should one of these events occur, we will make reasonable efforts to notify you before your information becomes subject to different privacy and security policies and practices.

#### Data that is Not Personal Data

We may create aggregated, de-identified or anonymized data from the Personal Data we collect, including by removing information that makes the data personally identifiable to a particular user. We may use such aggregated, de-identified or anonymized data and share it with third parties for our lawful business purposes, including to analyze, build and improve the Services and promote our business, provided that we will not share such data in a manner that could identify you.

### 4. TRACKING TOOLS AND OPT OUT.

The Site use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, “Cookies”) to enable our servers to recognize your web browser and tell us how and when you visit and use our Site, to analyze trends, learn about our user base and operate and improve our Site. Cookies are small pieces of data – usually text files – placed on your computer, tablet, phone or similar device when you use that device to access our Site. We may also supplement the information we collect from you with information received from third parties, including third parties that have placed their own Cookies on your device(s). Please note that because of our use of Cookies, the Site does not support “Do Not Track” requests sent from a browser at this time.

We use the following types of Cookies:

- **Essential Cookies.** Essential Cookies are required for providing you with features or services that you have requested. For example, certain Cookies enable you to log into secure areas of our Site. Disabling these Cookies may make certain features and services unavailable.
- **Functional Cookies.** Functional Cookies are used to record your choices and settings regarding our Site, maintain your preferences over time and recognize you when you return to our Site. These Cookies help us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Performance/Analytical Cookies.** Performance/Analytical Cookies allow us to understand how visitors use our Site such as by collecting information about the number of visitors to the Site, what pages visitors view on our Site and how long visitors are viewing pages on the Site. Performance/Analytical Cookies also help us measure the performance of our advertising campaigns in order to help us improve our campaigns and the Site’s content for those who engage with our advertising.

You can decide whether or not to accept Cookies through your internet browser’s settings. Most browsers have an option for turning off the Cookie feature, which will prevent your browser from accepting new Cookies, as well as (depending on the sophistication of your browser software) allow you to decide on acceptance of each new Cookie in a variety of ways. You can also delete all Cookies that are already on your device. If you do this, however, you may have to manually adjust some preferences every time you visit our website and some of the Site and functionalities may not work.

To explore what Cookie settings are available to you, look in the “preferences” or “options” section of your browser’s menu. To find out more information about Cookies, including information about how to manage and delete Cookies, please visit <https://ico.org.uk/for-the-public/online/cookies/> or <http://www.allaboutcookies.org/>.

## **5. SECURITY AND RETENTION.**

We seek to protect your Personal Data from unauthorized access, use and disclosure using appropriate physical, technical, and administrative security measures and storage and processing practices based on the type of Personal Data. For example, the Site uses industry standard Secure Sockets Layer (SSL) technology to allow for the encryption of Personal Data you provide to us. We retain Personal Data about you for as long as necessary to provide our Site and/or services to you, comply with our legal obligations, resolve disputes, or as otherwise permitted or required by applicable law, rule or regulation. We may further retain information in an anonymous or aggregated form where that information would not identify you personally.

Although we work to protect the security of your account and other data that we hold in our records, please be aware that no method of transmitting data or storing data over the Internet is completely secure. We cannot guarantee the complete security of any data you share with us, and except as expressly

required by law, we are not responsible for the theft, destruction, loss or inadvertent disclosure of your information or content.

## **6. PERSONAL DATA OF MINORS.**

We do not knowingly collect or solicit Personal Data about children under 16 years of age, except with parental consent. If we learn that we have collected personal information from an individual under the 16 years of age without parental consent, we will delete such information as quickly as possible. If you believe that a child under 16 years of age may have provided Personal Data to us, please contact us at [privacy@confidential.io](mailto:privacy@confidential.io).

## **7. PRIVACY RIGHTS OF CALIFORNIA RESIDENTS.**

If you are a resident of California, you have the rights set forth in this section. If there are any conflicts between this section and any other provision of this Privacy Policy, the portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following rights apply to you, please contact us at [privacy@confidential.io](mailto:privacy@confidential.io)

### **Access**

You have the right to request certain information about our collection and use of your Personal Data over the past 12 months, including the:

- Categories of Personal Data that we have collected about you.
- Specific pieces of Personal Data that we have collected about you.
- Categories of sources from which that Personal Data was collected.
- Business or commercial purpose for collecting your Personal Data.
- Categories of third parties with whom we have shared your Personal Data.
- Categories of Personal Data shared with third parties for a business purpose over the past 12 months, if applicable.

### **Deletion**

You have the right to request that we delete the Personal Data that we have collected about you, subject to certain exceptions under the CCPA: for example, we may need to retain your Personal Data to provide you with the Site or services or complete a transaction or other action you have requested. If your deletion request is subject to one of these exceptions, we may deny your deletion request.

### **Exercising Your CCPA Rights**

To exercise the rights described above, you must send us a request that (1) provides sufficient information to allow us to verify that you are either the person about whom we have collected Personal Data or are an agent authorized by that person, and (2) describes your request in sufficient detail to allow us to understand, evaluate and respond to it. Each request that meets both of these criteria will be considered a "Valid Request." We may not respond to requests that do not meet these criteria. We will only use Personal Data provided in a Valid Request to verify your identity and complete your request. **You may submit a Valid Request by emailing us at [privacy@confidential.io](mailto:privacy@confidential.io)**

We will work to respond to your Valid Request within 45 days of receipt. We will not charge you a fee for making a Valid Request unless your Valid Request(s) is excessive, repetitive or manifestly unfounded.

If we determine that your Valid Request warrants a fee, we will notify you of the fee and explain that decision before completing your request.

You may also authorize an agent (an “Authorized Agent”) to exercise your rights on your behalf. To do this, you must provide your Authorized Agent with written permission to exercise your rights on your behalf, and we may request a copy of this written permission from your Authorized Agent when they make a request on your behalf.

### **We Do Not Sell Your Personal Data**

We will not “sell” your Personal Data, as that term is defined in the CCPA, and have not done so over the last 12 months. We also do not sell the Personal Data of minors under 16 years of age.

### **We Will Not Discriminate Against You for Exercising Your Rights Under the CCPA**

We will not deny you access to our Site or provide you a lower quality of services if you exercise your rights under the CCPA. If you have any questions about this section or whether any of the above rights apply to you, please contact us at [privacy@confidential.io](mailto:privacy@confidential.io)

## **14. PRIVACY RIGHTS OF OTHER UNITED STATES RESIDENTS.**

### **California Resident Rights**

California residents are entitled to contact us to prevent disclosure of Personal Data to third parties for such third parties’ direct marketing purposes, under California Civil Code Sections 1798.83-1798.84. If you would like to submit such a request, please contact us at [privacy@confidential.io](mailto:privacy@confidential.io)

### **Nevada Resident Rights**

If you are a resident of Nevada, you have the right to opt-out of the sale of certain Personal Data to third parties who intend to license or sell that Personal Data. If you are a Nevada Resident, you can exercise this right by contacting us at [privacy@confidential.io](mailto:privacy@confidential.io) with the subject line “Nevada Do Not Sell Request” and providing us with your name. Please note that we do not currently sell your Personal Data as sales are defined in Nevada Revised Statutes Chapter 603A.

## **16. CHANGES TO THIS PRIVACY POLICY.**

We’re constantly trying to improve our Site and services, so we may need to change this Privacy Policy from time to time, but we will alert you to any such changes by placing a notice on our website, by sending you an email and/or by some other means. Please note that if you’ve opted not to receive legal notice emails from us (or you haven’t provided us with your email address), those legal notices will still govern your use of the Site and/or services, and you are still responsible for reading and understanding them. If you use the Site and/or services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes. Use of information we collect is subject to the Privacy Policy in effect at the time such information is collected.

## **17. CONTACT INFORMATION.**

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your Personal Data, or your choices and rights regarding such collection and use, please do not hesitate to contact us at: [privacy@confidential.io](mailto:privacy@confidential.io)