



## RELATIV.AI PRIVACY & SECURITY POLICY

**Last Updated: March 14, 2024**

Relativ.ai, Inc. (“**Relativ.ai**,” “**we**,” “**our**,” or “**us**”) values your privacy. This privacy policy (“**Policy**”), describes how Relativ.ai generally collects, uses, discloses, and otherwise processes the personal information we collect both on and offline. The information we collect and process about you will depend on your interactions with us.

By using our products or services, or by visiting any of the websites that we own or control that link to or post this Policy, including <https://relativ.ai>, (collectively, “**Services**”) you agree to your personal information being handled as described in this Policy. Your use of our Services and any dispute over privacy, is subject to this Policy and our [Terms and Conditions](#), including their applicable terms governing limitations on damages and the resolution of disputes.

This Policy does not apply to the information we process on behalf of our clients with whom we have entered written agreements with (“**Clients**”), which is governed by the agreements we have in place with them. If you have submitted data to a Client, the use of your data is governed by the policies of that Client. For detailed privacy information regarding the use of your data by a Client, or to exercise your rights regarding such Personal Data, please reach out to that organization directly. Our Clients control the use of data we process on their behalf and determine their own privacy practices and security settings. Relativ.ai may only access, share, distribute, or otherwise process personal data submitted to us by or on behalf of a Client as provided in the agreement between Relativ.ai and that Client, as instructed by the Client or as may be permitted by law. We are not responsible for the privacy or data security practices of our Clients, which may differ from those set forth in this Policy.

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## 1. Scope of this Policy

Except as otherwise described below, this Policy applies to the personal information Relativ.ai collects and processes related to:

- Visitors to our websites where this Policy is posted, including <https://relativ.ai>, and any other websites we own or control that link to or post this Policy (“Websites”).
- Current, former and prospective customers, agents, vendors, and business partners; and
- Individuals that communicate with us or otherwise interact or engage with us related to our Services.

**Additional Notices.** Depending on how you interact or engage with us, we may provide you with other privacy notices with additional details about our privacy practices. For example, this Policy also does not apply to job applicants and candidates who apply for employment with us, or to employees in the context of our working relationship with them.

## 2. Personal Information We May Collect

As further described below, we may collect personal information directly from you, automatically through your use of the Services, and from other, third-party sources.

While the personal information we collect varies depending on your use of our Services and our interactions with you, in general, we may collect personal information in the following instances:

- **Contact Information and Other Identifiers.** When you communicate with us or otherwise use our Services, we may collect your name, email address, phone number, address, date of birth, call recording, the nature of your inquiry, our responses and any other information you provide.
- **Responses and Feedback.** If you participate in our surveys or questionnaires, we may collect your responses and feedback, such as level of satisfaction or other information related to your use of our Services.
- **Preferences.** We also may collect information about your preferences, including communications preferences, preferences related to your use of our Services and any other preferences or requests derived from your interactions with our Services.
- **Account Information.** If you have an account with us through your employer, we collect your name, email address, and any other necessary information used in connection with accessing your account.

To the extent permitted by applicable law, we may link the information we collect from publicly available or third-party sources.

We and other third parties may automatically collect personal information when you visit our Website, including through the use of cookies, pixel tags, and other similar technologies. The personal information automatically collected may include:

- **Device and Browsing Information.** When you visit our Website or use our Services, we may collect IP address, browser type, domain names, access times, date/time stamps, operating system, language, device type, unique or online identifier, Internet service



provider, referring and exiting URLs, clickstream data, and similar device and browsing information.

- **Activities and Usage.** We may also collect activity information related to your use of the Website, such as information about links clicked, searches conducted, features used, items viewed, time spent on certain pages, your interactions with us, log file information, and other activity and usage information.
- **Location Information.** We may also collect or derive general location information about you, such as through your IP address.

For more information about our use of cookies and other similar technologies, please see the “**Cookies and Other Tracking Mechanisms**” sections below.

### 3. How We May Use Personal Information

How we use your personal information varies depending on how you interact with us. We may use personal information in the following ways:

- **Services and Support.** To allow you to maintain your account with us, provide and operate our Services, provide troubleshooting and technical support, and to otherwise run our day-to-day operations.
- **Analytics and Improvement.** To better understand how users access and use the Services, to evaluate and improve our Services and for other business operations such as to develop our Services and their features, and for internal quality control and training purposes.
- **Customization and personalization.** To personalize your experience within the Services by presenting information tailored to you.
- **Communicate With You.** To communicate with you including to obtain a better understanding of your needs and how we can improve our Services, to answer your questions and send you information and materials regarding our Services. We also use this information to send administrative information to you and to interact with you when you use various types of technologies, applications, and features related to our Services.
- **Marketing and Advertising.** To send you information about our Services, newsletters, products, other marketing content and information about events and new offerings.
- **Research and Surveys.** To administer surveys and questionnaires, such as for market research or user satisfaction purposes.
- **Security and Protection of Rights.** To protect our Services, business operations, and to protect ours or others’ rights; to prevent and detect fraud, unauthorized activities and access, and other misuse; where we believe necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety or legal rights of any person or third party or violations of our terms or policies.
- **Defending Legal Rights.** To manage and respond to actual and potential legal disputes and claims, and to otherwise establish, defend or protect our rights or interests, including in the context of anticipated or actual litigation with third parties.



- **Compliance and Legal Process.** To comply with applicable legal or regulatory obligations, including as part of a judicial proceeding; to respond to a subpoena, warrant, court order, or other legal process; or as part of an investigation or request from law enforcement or a governmental authority.
- **Auditing, Reporting, and Other Internal Operations.** To conduct financial, tax and accounting audits; assessments of our operations, privacy, security and financial controls, risk, and compliance with legal obligations; general business, accounting, record keeping and legal functions; and maintain appropriate business records and enforce company policies and procedures.
- **Other Uses:** We may use personal information for other uses that we will notify you of and/or that you may consent to.

#### 4. **How We May Disclose Personal Information**

We may disclose your personal information for the purposes described above and as follows:

- **Business Transfers.** We may disclose personal information as part of commercial transactions (e.g., mergers, acquisitions, bankruptcy, or other similar business transactions) and in contemplation of such transactions (e.g., due diligence).
- **Compliance, governance and legal requirements.** We may disclose personal information to comply with legal and compliance obligations and to respond to legal processes and related to legal proceedings. For example, we may disclose information in response to subpoenas, court orders, and other lawful requests by regulators and law enforcement, including responding to national security or law enforcement disclosure requirements. We may also disclose information, including personal information, related to litigation and other legal claims or proceedings in which we are involved, as well as for our internal accounting, auditing, compliance, recordkeeping, and legal functions.
- **Security and Protection of Rights.** We may disclose the personal information where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of this Policy or our Terms of Use, or as evidence in litigation in which we are involved. We may also disclose personal information to protect our rights and the rights of others.
- **Aggregate and De-identified Information.** We may share aggregated information derived from our Website and Services and the personal information we collect that does not identify or refer to any particular individual. We may also share de-identified information, which is no longer reasonably linkable to an identifiable individual, with third parties who have committed not to attempt to re-identify such data.
- **Other Disclosures.** We may disclose your personal information for other purposes, which we will notify you of and/or obtain your consent.

#### 5. **Cookies and Other Tracking Mechanisms**

We and other third parties use cookies, pixel tags, and other similar tracking mechanisms to automatically collect information about browsing activity, device type, and similar information



within our Website and Services. We use this information to, for example, analyze and understand how you access, use and interact with our Services; to identify and resolve bugs and errors in our Services; to assess, secure, protect, optimize, and improve the performance of our Services; for marketing, advertising, measurement and analytics purposes; and to personalize content in our Services. We may also deidentify or aggregate such information to analyze trends, administer our Services, gather broad demographic information for aggregate uses and for any other lawful purpose.

**Cookies.** “Cookies” are alphanumeric identifiers we transfer to your device through your browser for tracking purposes. Some cookies allow us to make it easier for you to navigate our Website, while others are used to enable a faster log-in process, support the security and performance of the Website, or allow us to track activity and usage data within the Website and across websites.

**Pixel Tags.** Pixel tags (sometimes called web beacons or clear GIFs) are tiny graphics with a unique identifier, similar in function to cookies. While cookies are stored locally on your device, pixel tags are embedded invisibly within web pages, emails and online content. We may use these to track our users’ activities, help manage content and compile usage statistics. We may also use these in our emails to let us know when they have been opened or forwarded so we can track response rates and gauge the effectiveness of our communications.

**Third Party Analytics.** We use third party tools, such as Google Analytics, which are operated by third party companies to evaluate usage of our Website. These third-party analytics companies use cookies, pixels, and other tracking technologies to collect usage data about our Website to provide us with reports and metrics that help us evaluate usage of our Website, improve our Website, and enhance performance and user experience. To learn more about Google’s privacy practices, please review the Google Privacy Policy at <https://www.google.com/policies/privacy/partners/>. You can also download the Google Analytics Opt-out Browser Add-on to prevent your data from being used by Google Analytics at <https://tools.google.com/dlpage/gaoptout>.

**Cross-Device Tracking.** We and third parties may use the information we collect about you within our Website and on other third-party websites and services to help us and these third parties identify other devices that you use (e.g., a mobile phone, tablet, other computer, etc.) to interact or engage with us or the Website.

## 6. Security

No data transmission over the Internet can be guaranteed to be 100% secure. As a result, we cannot guarantee or warrant the security of any information collected through our Services. We however understand the critical importance of security as a B2B SaaS provider. To that end, we address common concerns that our partners and clients may have as follows:

- **Data Encryption.** All data transmitted between end points and our servers is encrypted using industry standard protocols such as TLS (Transport Layer Security). This helps maintain the confidentiality and security of any information during transit.
- **Data Storage.** All our data is stored on Amazon Web Services (AWS) and is in compliance with industry standard measures. The data may be distributed in geographically diverse locations as needed to mitigate risk of loss. In addition, redundancy of data storage is built into the cloud infrastructure.



- **Access Control.** We have very strict policies for access control and privileged access to any of our cloud based services and stored data infrastructure. Multi-Factor Authentication is a requirement for all users with elevated privileges and only very limited authorized personnel can access data stored on our cloud. Additionally, the same principles of access control are applied to our software development code and infrastructure.
- **Compliance.** We recognize and adhere to industry standards such as GDPR, CCPA, ISO27001, and SOC2 compliance. We are set up to conduct external security audits including penetration testing of our cloud-based services in collaboration with our partners and clients, to provide them with the highest industry standards.
- **Vulnerability Management and Continuous Monitoring.** We are constantly monitoring our cloud based services and infrastructure, and patch them with the latest security updates that help remediate potential threats and security weaknesses.
- **Incident Response.** We have established procedures and protocols to respond to security incidents, and have a dedicated DevOps team that handles such incidents to minimize the impact on regular operations for our clients.
- **Communication.** We pride ourselves on transparent and timely communication with our clients and partners on all matters relating to data privacy and security. In the unlikely event of a breach, we will promptly notify all affected parties, while also providing regular updates on the status of the issue until it has been resolved.

## 7. Retention

Your personal information will be retained until such time as needed to fulfill the purposes for which it was collected, to operate our business and as necessary to comply with our legal obligations, regulatory requests, to resolve disputes, and enforce our agreements.

## 8. Your Privacy Choices

We provide several ways for you to manage your personal information.

- **Cookie Settings.** To prevent cookies from tracking your activity on our Website or visits across multiple websites, you can set your browser to block certain cookies or notify you when a cookie is set; you can also delete cookies. The “Help” portion of the toolbar on most browsers will tell you how to prevent your device from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to delete cookies. Visitors to our Website who disable cookies will be able to browse the Website, but some features may not function.
- **Industry Ad Choice Programs.** You can also control how participating third-party ad companies use the information that they collect about your visits to our Website and those of third parties, in order to display more relevant targeted advertising to you. You can obtain more information and opt out of receiving targeted ads from participating third-party ad networks at [aboutads.info/choices](https://aboutads.info/choices) (Digital Advertising Alliance). Please note that opting out of participating ad networks does not opt you out of being served all advertising. You may continue to receive generic or contextual ads on our Website. You may also continue to receive targeted ads on other websites from companies that do not participate in the above programs.



- **Marketing and Other Communications.** You can opt out of receiving marketing emails from us by using the unsubscribe feature in any such email we send you.
- **Do Not Track Signals.** Note that your browser settings may allow you to automatically transmit a “Do Not Track” signal to websites and online services you visit. Like many websites and online services, we currently do not alter our practices when receiving a “Do Not Track” signal from a visitor’s browser. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

## 9. Children’s Information

Our Services are not designed for children, and we do not knowingly collect personal information from children. If you are a parent or legal guardian and you believe we have collected personal information from your child in violation of applicable law, please contact us using the contact information below.

## 10. External Links and Features

Our Website and Services may contain links to third-party websites or features. Any access to and use of such linked websites or features is not governed by this Policy, but instead is governed by the privacy policies of those third parties. We are not responsible for the information practices of such third parties, including their collection of your personal information. You should review the privacy policies and terms for any third parties before proceeding to those websites or using those features.

## 11. Changes to Our Policy

If we decide to change or update our Policy, we will post those changes on this page. Your continued use of the Website is subject to our most up-to-date Policy, posted here. If we make any material changes, we may notify you by means of a prominent notice on our Website.

## 12. Contact Us

If you have any questions or concerns regarding this Policy, please contact us at: [info@relativ.ai](mailto:info@relativ.ai).