

Effective date: 19 July 2023

At Findem, Inc (“Findem,” “we,” “us,” “our,” or the “Company”), we take your privacy seriously. Please read this Privacy Policy to learn how we treat your personal data. By using or accessing our 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.

Remember that your use of Findem’s Services is at all times subject to our [Terms and Conditions](#), which incorporates this Privacy Policy. Any terms we use in this Policy without defining them have the definitions given to them in the Terms of Use.

As we continually work to improve our Services, we may need to change this Privacy Policy from time to time. Upon such changes, we will alert you to any such changes by placing a notice on the Findem 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 Services, and you are still responsible for reading and understanding them. If you use the Services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes.

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What this Privacy Policy Covers

This Privacy Policy covers how we treat Personal Data that we gather when you access or use our website or services or when you attend our corporate events as well as the Personal Data that we collect from third party sources to provide our talent acquisition and management services (collectively, the “Services”). “Personal Data” means any information that identifies or relates to a particular individual and also includes information referred to as “personally identifiable information” or “personal information” or “sensitive personal information” under applicable data privacy laws, rules or regulations. This Privacy Policy does not cover the practices of companies we don’t own or control or people we don’t manage.

Personal Data

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:

<u>Category of Personal Data</u>	<u>Examples of Personal Data We Collect</u>	<u>Categories of Third Parties With Whom We Share this Personal Data:</u>
Profile or Contact Data	<ul style="list-style-type: none">• First and last name• Address• Email• Phone number	<ul style="list-style-type: none">• Service Providers• Analytics Partners• Business Partners

<u>Category of Personal Data</u>	<u>Examples of Personal Data We Collect</u>	<u>Categories of Third Parties With Whom We Share this Personal Data:</u>
	<ul style="list-style-type: none"> • Company name • Unique identifiers (such as passwords for Findem users) 	<ul style="list-style-type: none"> • Parties You Authorize, Access or Authenticate
Payment Data	<ul style="list-style-type: none"> • Financial account information • Payment card type • Last 4 digits of payment card • Billing name, address, phone number, and email 	<ul style="list-style-type: none"> • Service Providers (specifically our payment processing partner, currently Stripe, Inc.
Commercial Data	<ul style="list-style-type: none"> • Purchase history • Consumer profiles 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Analytics Partners • Business Partners • Parties You Authorize, Access or Authenticate
Device/IP Data	<ul style="list-style-type: none"> • IP address • Device ID • Domain server • Type of device/operating system/browser used to access the Services • Hashed identifiers 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Analytics Partners • Business Partners • Parties You Authorize, Access or Authenticate
Web Analytics	<ul style="list-style-type: none"> • Web page interactions • Referring webpage/source through which you accessed the Services • Non-identifiable request IDs • Statistics associated with the interaction between device or browser and the Services 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Analytics Partners • Business Partners • Parties You Authorize, Access or Authenticate
Social Network Data	<ul style="list-style-type: none"> • Email • Usernames/user handles 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Analytics Partners • Business Partners • Parties You Authorize, Access or Authenticate
Consumer Demographic Data	<ul style="list-style-type: none"> • Address/Zip code • Gender • Race • Ethnicity 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Analytics Partners • Business Partners • Parties You Authorize, Access or Authenticate
Professional or Employment-Related Data	<ul style="list-style-type: none"> • Resume/CV • Job title • Industry • Job history 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Analytics Partners • Business Partners • Parties You Authorize, Access or Authenticate
Geolocation Data	<ul style="list-style-type: none"> • IP-address-based location information 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Analytics Partners • Business Partners • Parties You Authorize, Access or Authenticate
Categories of Data Considered “Sensitive” Under the California Privacy Rights Act	<ul style="list-style-type: none"> • Race or ethnic origin • Personal data revealing citizenship or immigration status 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Analytics Partners • Business Partners • Parties You Authorize, Access or Authenticate

<u>Category of Personal Data</u>	<u>Examples of Personal Data We Collect</u>	<u>Categories of Third Parties With Whom We Share this Personal Data:</u>
and the Virginia Consumer Data Protection Act		
Inferences Drawn From Other Personal Data Collected	<ul style="list-style-type: none"> • Inferences reflecting user attributes 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Analytics Partners • Business Partners • Parties You Authorize, Access or Authenticate
Other Identifying Information that You Voluntarily Choose to Provide	<ul style="list-style-type: none"> • Identifying information in emails, letters, texts, or other communications you send us • Identifying information in survey responses and contest or sweepstakes submissions. 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Analytics Partners • Business Partners • Parties You Authorize, Access or Authenticate
Other	<ul style="list-style-type: none"> • Publicly available professional data, including job title, skills (i.e. contributions to github, stackoverflow, etc.) 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Analytics Partners • Business Partners • Parties You Authorize, Access or Authenticate

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 create an account or use our interactive tools and Services.
 - When you voluntarily provide information in free-form text boxes through the Services or through responses to surveys or questionnaires.
 - When you send us an email or otherwise contact us.
- When you use the Services and such information is collected automatically.
 - Through Cookies (defined in the “Tracking Tools, Advertising and Opt-Out” section below).
 - If you download our mobile application or use a location-enabled browser, we may receive information about your location and mobile device, as applicable.
 - If you download and install certain applications and software we make available, we may receive and collect information transmitted from your computing device for the purpose of providing you the relevant Services, such as

information regarding when you are logged on and available to receive updates or alert notices.

Public Records

- From the government or other sources.

Third Parties

- Vendors
 - We may use analytics providers to analyze how you interact and engage with the Services, or third parties may help us provide you with customer support.
 - We may use vendors, including data brokers, to obtain information to generate leads and create user profiles.
- Advertising Partners
 - We receive information about you from some of our vendors who assist us with marketing or promotional services related to how you interact with our websites, applications, products, Services, advertisements or communications.
- Social Networks
 - If you provide your social network account credentials to us or otherwise sign in to the Services through a third-party site or service, some content and/or information in those accounts may be transmitted into your account with us.
- Other
 - We also scrape the public internet for publicly-available professional data.

Our Commercial or Business Purposes for Collecting or Disclosing Personal Data

Providing, Customizing and Improving the Services

- Creating and managing your account or other user profiles.
- Processing orders or other transactions; billing.
- 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 Services.
- Improving the Services, including testing, research, internal analytics and product development.

- Personalizing the Services, 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, as amended by the California Privacy Rights Act of 2020 (the “CPRA”).

Marketing the Services

- Marketing and selling the Services.
- Showing you advertisements, including interest-based or online behavioral advertising.

Corresponding with You

- Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about Findem or the Services.
- 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, Findem or another party.
- Enforcing any agreements with you.
- Responding to claims that any posting or other content violates third-party rights.
- Resolving disputes.

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. If you are a California resident, please note that we only use or disclose your sensitive personal information for the purposes set forth in section 7027(m) of the CPRA

regulations and we do not collect or process sensitive personal information with the purpose of inferring any characteristics about California residents.

How We Disclose 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 the Services or perform business functions on our behalf, which may be by automated means. They include:

- Hosting, technology and communication providers.
- Providers of generative AI products integrated into our services
- Security and fraud prevention consultants like, [Vanta](#) and [TAC Security](#), for compliance and auditing purposes.
- Payment processors.
 - Our payment processing partner, Stripe, Inc, which collects your voluntarily-provided payment card information necessary to process your payment.
 - Please see Stripe's [terms of service](#) and [privacy policy](#) for information on its use and storage of your Personal Data.

Advertising Partners. These parties help us market our services and provide you with other offers that may be of interest to you. They include:

- Ad networks.
- Data brokers.
- Marketing providers.

Analytics Partners. These parties provide analytics on web traffic or usage of the Services. They include:

- Companies that track how users found or were referred to the Services.
- Companies that track how users interact with the Services.

Business Partners. These parties partner with us in offering various services. They include:

- Businesses that you have a relationship with.
- Companies that we partner with to offer joint promotional offers or opportunities.

Parties You Authorize, Access or Authenticate

- Third parties you access through the services.
- Social media services.
- Other users.

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.

Tracking Tools, Advertising and Opt-Out

The Services 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, tell us how and when you visit and use our Services, analyze trends, learn about our user base and operate and improve our Services. 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 Services. 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 Services do 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 Services. Disabling these Cookies may make certain features and services unavailable.
- **Functional Cookies.** Functional Cookies are used to record your choices and settings regarding our Services, maintain your preferences over time and recognize you when you return to our Services. 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 Services. They do this by collecting information about the number of visitors to the Services, what pages visitors view on our Services and how long visitors are viewing pages on the Services. Performance/Analytical Cookies also help us measure the performance of our advertising campaigns in order to help us improve our campaigns and the Services’ content for those who engage with our advertising. For example, Google LLC (“Google”) uses cookies in connection with its Google Analytics services. Google’s ability to use and share information collected by Google Analytics about your visits to the Services is subject to the Google Analytics Terms of Use and the Google Privacy Policy. You have the option to opt-out of Google’s use of Cookies by visiting the Google advertising opt-out page at

www.google.com/privacy_ads.html or the Google Analytics Opt-out Browser Add-on at <https://tools.google.com/dlpage/gaoptout/>.

- Retargeting/Advertising Cookies. Retargeting/Advertising Cookies collect data about your online activity and identify your interests so that we can provide advertising that we believe is relevant to you. For more information about this, please see the section below titled “Information about Interest-Based Advertisements.”

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 Services and functionalities may not work.

To explore what Cookie settings are available to you or to modify your preferences with respect to Cookies, you can access your Cookie management settings by clicking <LINK>. To find out more information about Cookies generally, including information about how to manage and delete Cookies, please visit <http://www.allaboutcookies.org/> or <https://ico.org.uk/for-the-public/online/cookies/> if you are located in the European Union.

Information about Interest-Based Advertisements:

We may serve advertisements, and also allow third-party ad networks, including third-party ad servers, ad agencies, ad technology vendors and research firms, to serve advertisements through the Services. These advertisements may be targeted to users who fit certain general profile categories or display certain preferences or behaviors (“Interest-Based Ads”). Information for Interest-Based Ads (including Personal Data) may be provided to us by you, or derived from the usage patterns of particular users on the Services and/or services of third parties. Such information may be gathered through tracking users’ activities across time and unaffiliated properties, including when you

leave the Services. To accomplish this, we or our service providers may deliver Cookies, including a file (known as a “web beacon”) from an ad network to you through the Services. Web beacons allow ad networks to provide anonymized, aggregated auditing, research and reporting for us and for advertisers. Web beacons also enable ad networks to serve targeted advertisements to you when you visit other websites. Web beacons allow ad networks to view, edit or set their own Cookies on your browser, just as if you had requested a web page from their site.

We comply with the Digital Advertising Alliance (“DAA”) Self-Regulatory Principles for Online Behavioral Advertising. Through the DAA and Network Advertising Initiative (“NAI”), several media and marketing associations have developed an industry self-regulatory program to give consumers a better understanding of, and greater control over, ads that are customized based a consumer’s online behavior across different websites and properties. To make choices about Interest-Based Ads from participating third parties, including to opt-out of receiving behaviorally targeted advertisements from participating organizations, please visit the DAA’s or NAI’s consumer opt-out pages, which are located at <http://www.networkadvertising.org/choices/> or www.aboutads.info/choices. Users in the European Union should visit the European Interactive Digital Advertising Alliance’s user information website <http://www.youronlinechoices.eu/>.

Data Security

We seek to protect your Personal Data from unauthorized access, use and disclosure using appropriate physical, technical, organizational and administrative security measures based on the type of Personal Data and how we are processing that data. You should also help protect your data by appropriately selecting and protecting your password and/or other sign-on mechanism; limiting access to your computer or device and browser; and signing off after you have finished accessing your account. 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 over the internet or storing data is completely secure.

Data Retention

We retain Personal Data about you for as long as necessary to provide you with our Services or to perform our business or commercial purposes for collecting your Personal Data. When establishing a retention period for specific categories of data, we consider who we collected the data from, our need for the Personal Data, why we collected the Personal Data, and the sensitivity of the Personal Data. In some cases we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is 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.

For example:

- We retain your profile information and credentials for as long as you have an account with us.
- We retain your payment data for as long as we need to process your purchase or subscription.
- We retain your device/IP data for as long as we need it to ensure that our systems are working appropriately, effectively and efficiently.
- We retain professional experience/resume data on for as long as they have given consent

Personal Data of Children

We do not knowingly collect or solicit Personal Data about children under 16 years of age; if you are a child under the age of 16, please do not attempt to register for or otherwise use the Services or send us any Personal Data. If we learn we have collected Personal Data from a child under 16 years of age, we will delete that 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@findem.ai.

California Resident Rights

If you are a California resident, you have the rights set forth in this section. Please see the “Exercising Your Rights” section below for instructions regarding how to exercise these rights. Please note that we may process Personal Data of our customers’ end users or employees in connection with our provision of certain services to our

customers. If we are processing your Personal Data as a service provider, you should contact the entity that collected your Personal Data in the first instance to address your rights with respect to such data.

If there are any conflicts between this section and any other provision of this Privacy Policy and you are a California resident, 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@findem.ai.

Access

You have the right to request certain information about our collection and use of your Personal Data over the past 12 months. In response, we will provide you with the following information:

- The categories of Personal Data that we have collected about you.
- The categories of sources from which that Personal Data was collected.
- The business or commercial purpose for collecting or selling your Personal Data.
- The categories of third parties with whom we have shared your Personal Data.
- The specific pieces of Personal Data that we have collected about you.

If we have disclosed your Personal Data to any third parties for a business purpose over the past 12 months, we will identify the categories of Personal Data shared with each category of third party recipient. If we have sold your Personal Data over the past 12 months, we will identify the categories of Personal Data sold to each category of third party recipient.

Deletion

You have the right to request that we delete the Personal Data that we have collected about you. Under the CPRA, this right is subject to certain exceptions: for example, we may need to retain your Personal Data to provide you with the Services or complete a transaction or other action you have requested, or if deletion of your Personal Data involves disproportionate effort. If your deletion request is subject to one of these exceptions, we may deny your deletion request.

Correction

You have the right to request that we correct any inaccurate Personal Data we have collected about you. Under the CPRA, this right is subject to certain exceptions: for example, if we decide, based on the totality of circumstances related to your Personal Data, that such data is correct. If your correction request is subject to one of these exceptions, we may deny your request.

Personal Data Sales Opt-Out and Opt-In

In this section, we use the term ‘sell’ as it is defined in the CPRA. We sell your Personal Data, subject to your right to opt-out of these sales.

As described in the “Tracking Tools, Advertising and Opt-Out” section above, we have incorporated Cookies from certain third parties into our Services. These Cookies allow those third parties to receive information about your activity on our Services that is associated with your browser or device. Those third parties may use that data to serve you relevant ads on our Services or on other websites you visit. Under the CPRA, sharing your data through third party Cookies for online advertising may be considered a “sale” of information. You can opt out of these sales by following the instructions in this section.

We sell your Personal Data to the following categories of third parties:

- Ad Networks.
- Marketing providers

Over the past 12 months, we have sold the following categories of your Personal Data to categories of third parties listed above:

- Profile or Contact Data
- Commercial Data
- Device/IP Data
- Web Analytics
- Social Network Data
- Consumer Demographic Data
- Professional or Employment-Related Data

- Geolocation Data
- Categories of Data Considered “Sensitive” Under the California Privacy Rights Act and the Virginia Consumer Data Protection Act
- Inferences Drawn From Other Personal Data Collected
- Other

We have sold the foregoing categories of Personal Data for the following business or commercial purposes:

- Improving the Services, including testing, research, internal analytics and product development.
- Personalizing the Services, website content and communications based on your preferences.
- Doing fraud protection, security and debugging.
- Marketing and selling the Services.
- Showing you advertisements, including interest-based or online behavioral advertising.

You have the right to opt-out of the sale of your Personal Data. You can opt-out using the following methods:

- You can complete the online form found here: Do Not Sell or Share My Personal Information<<https://www.findem.ai/do-not-sell>>.
- Email us at privacy@findem.ai
- By implementing the Global Privacy Control or similar control that is legally recognized by a government agency or industry standard. Please note this [does][does not] include Do Not Track signals.

Once you have submitted an opt-out request, we will not ask you to reauthorize the sale of your Personal Data for at least 12 months.

To our knowledge, we do not sell the Personal Data of minors under 16 years of age.

Personal Data Sharing Opt-Out and Opt-In

Under the CPRA, California residents have certain rights when a business “shares” Personal Data with third parties for purposes of cross-contextual behavioral advertising.

We have shared the foregoing categories of Personal Data for the purposes of cross-contextual behavioral advertising.

- Profile or Contact Data
- Commercial Data
- Device/IP Data
- Web Analytics
- Social Network Data
- Consumer Demographic Data
- Professional or Employment-Related Data
- Geolocation Data
- Categories of Data Considered “Sensitive” Under the California Privacy Rights Act and the Virginia Consumer Data Protection Act
- Inferences Drawn From Other Personal Data Collected
- Other

As described in the “Tracking Tools, Advertising and Opt-Out” section above, we have incorporated Cookies from certain third parties into our Services. These Cookies allow those third parties to receive information about your activity on our Services that is associated with your browser or device. Those third parties may use that data to serve you relevant ads on our Services or on other websites you visit. Under the CPRA, sharing your data through third party Cookies for online advertising may be considered a “sale” of information. You can opt out of data selling and/or sharing by following the instructions in this section.]

We share Personal Data with the following categories of third parties:

- Ad Networks.
- Marketing providers [(including for cross-contextual behavioral advertising purposes)]

Over the past 12 months, we have shared the following categories of Personal Data with the categories of third parties listed for the following purposes:

- Marketing and selling the Services.
- Showing you advertisements, including interest-based or online behavioral advertising.

You have the right to opt-out of the sharing of your Personal Data. You can opt-out using the following methods:

- You can complete the online form found here: Do Not Sell or Share My Personal Information<<https://www.findem.ai/do-not-sell>>.
- You can email us at privacy@findem.ai
- You can use a Global Privacy Control or similar control that is legally recognized by a government agency or industry standard. Please note this [does][does not] include Do Not Track signals.

Once you have submitted an opt-out request, we will not ask you to reauthorize the sharing of your Personal Data for at least 12 months.

To our knowledge, we do not share the Personal Data of minors under 16 years of age.

We Will Not Discriminate Against You for Exercising Your Rights Under the CPRA

We will not discriminate against you for exercising your rights under the CPRA.

We will not deny you our goods or services, charge you different prices or rates, or provide you a lower quality of goods and services if you exercise your rights under the CPRA. However, we may offer different tiers of our Services as allowed by applicable data privacy laws (including the CPRA) with varying prices, rates or levels of quality of the goods or services you receive related to the value of Personal Data that we receive from you.

Virginia Resident Rights

If you are a Virginia resident, you have the rights set forth under the Virginia Consumer Data Protection Act (“VCDPA”). Please see the “Exercising Your Rights” section below for instructions regarding how to exercise these rights. Please note that we may process Personal Data of our customers’ end users or employees in connection with our provision of certain services to our customers. If we are processing your Personal Data as a service provider, you should contact the entity that collected your Personal Data in the first instance to address your rights with respect to such data. Additionally, please

note that these rights are subject to certain conditions and exceptions under applicable law, which may permit or require us to deny your request.

If there are any conflicts between this section and any other provision of this Privacy Policy and you are a Virginia resident, 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@findem.ai.

Access

You have the right to request confirmation of whether or not we are processing your Personal Data and to access your Personal Data.

Correction

You have the right to correct inaccuracies in your Personal Data, to the extent such correction is appropriate in consideration of the nature of such data and our purposes of processing your Personal Data.

Portability

You have the right to request a copy of your Personal Data in a machine-readable format, to the extent technically feasible.

Deletion

You have the right to delete your Personal Data.

Opt-Out of Certain Processing Activities

- You have the right to opt-out of the processing of your Personal Data for targeted advertising purposes. We process your Personal Data for targeted advertising purposes. To opt-out of our processing of Personal Data for targeted advertising purposes, please see “Personal Data Sharing Opt-Out and Opt-In” under the “California Resident Rights” section above.
- You have the right to opt-out to the sale of your Personal Data. We do not currently sell your Personal Data as defined under the VCDPA.

- You have the right to opt-out from the processing your Personal Data for the purposes of profiling in furtherance of decisions that produce legal or similarly significant effects to you, if applicable.

Appealing a Denial

If we refuse to take action on a request within a reasonable period of time after receiving your request in accordance with this section. In such appeal, you must (1) provide sufficient information to allow us to verify that you are the person about whom the original request pertains and to identify the original request, and (2) provide a description of the basis of your appeal. Please note that your appeal will be subject to your rights and obligations afforded to you under the VCDPA. We will respond to your appeal within 60 days of receiving your request. If we deny your appeal, you have the right to contact the Virginia Attorney General using the methods described at <https://www.oag.state.va.us/consumer-protection/index.php/file-a-complaint>.

You may appeal a decision by us using the following methods:

- Email us at: privacy@findem.ai (title must include “VCDPA Appeal”)
- Submit a form at this address: <https://www.findem.ai/do-not-sell>

Exercising Your Rights under CPRA and VCPDA

To exercise the rights described in this Privacy Policy, you or, if you are a California resident, your Authorized Agent (defined below) must send us a request that (1) provides sufficient information to allow us to verify that you are the person about whom we have collected Personal Data including, but not limited to your full name, email address, and social media handles 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 do not need an account to submit a Valid Request.

We will work to respond to your Valid Request within the time period required by applicable law. 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 submit a Valid Request using the following methods:

- Email us at: privacy@findem.ai
- Submit a form at this address: <https://www.findem.ai/do-not-sell>

If you are a California resident, 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.

Other State Law Privacy Rights

California Resident Rights

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to contact us to prevent disclosure of Personal Data to third parties for such third parties’ direct marketing purposes; in order to submit such a request, please contact us at privacy@findem.ai.

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. You can exercise this right by contacting us at privacy@findem.ai with the subject line “Nevada Do Not Sell Request” and providing us with your name and the email address associated with your account. Please note that we do not currently sell your Personal Data as sales are defined in Nevada Revised Statutes Chapter 603A.

European Union and United Kingdom Data Subject Rights

EU and UK Residents

If you are a resident of the European Union (“EU”), United Kingdom (“UK”), Lichtenstein, Norway or Iceland, you may have additional rights under the EU or UK General Data Protection Regulation (the “GDPR”) with respect to your Personal Data, as outlined below.

For this section, we use the terms “Personal Data” and “processing” as they are defined in the GDPR, but “Personal Data” generally means information that can be used to individually identify a person, and “processing” generally covers actions that can be performed in connection with data such as collection, use, storage and disclosure. Findem will be the controller of your Personal Data processed in connection with the Services.

If there are any conflicts between this section and any other provision of this Privacy Policy, the policy or 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 applies to you, please contact us at privacy@findem.ai. Note that we may also process Personal Data of our customers’ end users or employees in connection with our provision of certain services to customers, in which case we are the processor of Personal Data. If we are the processor of your Personal Data (i.e., not the controller), please contact the controller party in the first instance to address your rights with respect to such data.

Personal Data We Collect

The “Categories of Personal Data We Collect” section above details the Personal Data that we collect from you.

Personal Data Use and Processing Grounds

The “Our Commercial or Business Purposes for Collecting Personal Data” section above explains how we use your Personal Data.

We will only process your Personal Data if we have a lawful basis for doing so. Lawful bases for processing include consent, contractual necessity and our “legitimate interests” or the legitimate interest of others, as further described below.

- Contractual Necessity: We process the following categories of Personal Data as a matter of “contractual necessity”, meaning that we need to process the data to perform under our Terms and Conditions with you, which enables us to provide you with the Services. When we process data due to contractual necessity, failure to provide such Personal Data will result in your inability to use some or all portions of the Services that require such data.
- Profile or Contact Data
- Payment Data
- Commercial Data
- Legitimate Interest: We process the following categories of Personal Data when we believe it furthers the legitimate interest of us or third parties:
 - Profile or Contact Data
 - Payment Data
 - Commercial Data
 - Device/IP Data
 - Web Analytics
 - Social Network Data
 - Consumer Demographic Data
 - Professional or Employment-Related Data
 - Geolocation Data
 - Categories of Data Considered “Sensitive” Under the California Privacy Rights Act and the Virginia Consumer Data Protection Act
 - Inferences Drawn From Other Personal Data Collected
 - Other Identifying Information that You Voluntarily Choose to Provide
 - Other
- We may also de-identify or anonymize Personal Data to further our legitimate interests.

Examples of these legitimate interests include (as described in more detail above):

- Providing, customizing and improving the Services.
- Marketing the Services.
- Corresponding with you.
- Meeting legal requirements and enforcing legal terms.
- Completing corporate transactions.

- Consent: In some cases, we process Personal Data based on the consent you expressly grant to us at the time we collect such data. When we process Personal Data based on your consent, it will be expressly indicated to you at the point and time of collection.
- Other Processing Grounds: From time to time we may also need to process Personal Data to comply with a legal obligation, if it is necessary to protect the vital interests of you or other data subjects, or if it is necessary for a task carried out in the public interest.

Sharing Personal Data

The “How We Share Your Personal Data” section above details how we share your Personal Data with third parties.

EU Data Subject Rights

You have certain rights with respect to your Personal Data, including those set forth below. For more information about these rights, or to submit a request, please email us at privacy@findem.ai. Please note that in some circumstances, we may not be able to fully comply with your request, such as if it is frivolous or extremely impractical, if it jeopardizes the rights of others, or if it is not required by law, but in those circumstances, we will still respond to notify you of such a decision. In some cases, we may also need you to provide us with additional information, which may include Personal Data, if necessary to verify your identity and the nature of your request.

- Access: You can request more information about the Personal Data we hold about you and request a copy of such Personal Data. If you are a customer, you can also access certain of your Personal Data by logging on to your account.
- Rectification: If you believe that any Personal Data we are holding about you is incorrect or incomplete, you can request that we correct or supplement such data. If you are a customer, you can also correct some of this information directly by logging on to your account.
- Erasure: You can request that we erase some or all of your Personal Data from our systems.
- Withdrawal of Consent: If we are processing your Personal Data based on your consent (as indicated at the time of collection of such data), you have the right to

withdraw your consent at any time. Please note, however, that if you exercise this right, you may have to then provide express consent on a case-by-case basis for the use or disclosure of certain of your Personal Data, if such use or disclosure is necessary to enable you to utilize some or all of our Services.

- Portability: You can ask for a copy of your Personal Data in a machine-readable format. You can also request that we transmit the data to another controller where technically feasible.
- Objection: You can contact us to let us know that you object to the further use or disclosure of your Personal Data for certain purposes, such as for direct marketing purposes.
- Restriction of Processing: You can ask us to restrict further processing of your Personal Data.
- Right to File Complaint: You have the right to lodge a complaint about Findem's practices with respect to your Personal Data with the supervisory authority of your country or EU Member State. A list of Supervisory Authorities is available here: https://edpb.europa.eu/about-edpb/board/members_en.

Transfers of Personal Data

The Services are hosted and operated in the United States ("U.S.") through Findem and its service providers, and if you do not reside in the U.S., laws in the U.S. may differ from the laws where you reside. By using the Services, you acknowledge that any Personal Data about you, regardless of whether provided by you or obtained from a third party, is being provided to Findem in the U.S. and will be hosted on U.S. servers, and you authorize Findem to transfer, store and process your information to and in the U.S., and possibly other countries. In some circumstances, your Personal Data may be transferred to the U.S. pursuant to a data processing agreement incorporating standard data protection clauses.

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:

- 650-632-7215
- <https://www.findem.ai>
- privacy@findem.ai
- 702 Marshall Street, Redwood City, CA 94063

If you are located in the EU or UK, you may use the following information to contact our Data Protection Officer and our EU or UK-Based Member Representative:

- {MemberRep}
- UK Member Representative