

Privacy Policy

Last modified: 27 March, 2024

Introduction

At Scribbl, Inc. ("**Scribbl**", "**we**" or "**us**"), we respect your privacy and are committed to protecting it through our compliance with this policy. This policy informs you of our practices when handling Personal Information through the Services.

The Scribbl Services enable virtual meeting hosts to record video, transcribe and store the output of a meeting, including the content, participants and any documentation associated with that meeting ("**Meeting Record**"). Hosts may organize a meeting via the Website and record a meeting live while they are in the virtual meeting room with other meeting participants.

For the purpose of this policy, "**personal information**" means any information relating to an identified or identifiable individual. This includes personal information you provide or generate when you (a) use or visit the website www.scribbl.co or any of its subdomains ("**Website**") and (b) download and/or use our web extension to create a Meeting Record, and use of additional service features as explained in the Term and on the Website (collectively, the "**Services**").

This policy does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by Scribbl or any third party (including our affiliates and subsidiaries); or
- Any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or through the use of the Services.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Services. When you use the Services, you accept and understand that we collect, process, use, and store your personal information as described in this policy.

Identity and contact information of the Data Controller

For the purposes of data protection legislation in the European Union, Scribbl is a data controller. Where we have an enterprise customer or an account holder using Scribbl on behalf of a corporation or other legal entity, we obtain and process your personal information on behalf of and at the instruction of that customer or account holder. In that context, Scribbl is a data processor.

Children Under the Age of 16

Our Services are not intended for children under 16 years of age. No one under age 16 may provide any personal information through use of the Services. We do not knowingly collect personal information from children under 16. If you are under 16, do not use or provide any information on this Website or through any of our Services. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us.

Personal Information We Collect About You and How We Collect It

We collect several types of information from and about users of our Services, including information:

- **Identity Data**, which includes your first name, last name, social media profile, user ID, company name, job position and company department.
- **Contact Data**, which includes your email address.
- **Content Data**, any personal data which is contained within the audio or video file that you ask us to transcribe.
- **Transaction Data**, which includes details about payments to and from you and other details of services you have purchased from us.
- **Technical Data**, which includes your internet protocol (IP) address, your login data, browser type and version, time zone setting and location you use to access the Services.
- **Profile Data**, which includes your password, subscriptions purchased by you, your preferences, feedback and survey responses.
- **Usage Data**, which includes information about how you use our Services.

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.
- From third parties, for example, our business partners, such as payment processors collect financial data (such as your payment card details) when you make payment to us.

Information You Provide to Us About Others

- If you choose to use our Services during your meeting, please note that the Meeting Records will contain personal information of third parties. Before you do so, please make sure you have the necessary permissions from your co-workers, friends or other third parties before sharing their personal information with us or referring them to us.

Information You Provide to Us

The information we collect on or through our Website may include:

- Information that you provide at the time of subscribing to use our Services. We may also ask you for information when you enter a contest or promotion sponsored by us, and when you report a problem with our Service.
- Records and copies of your correspondence (including email addresses) with us.
- Details of the Meeting Records prepared through our Services.
- Your search queries on the Website.

Your Meeting Records are prepared, posted on and transmitted to others at your own risk. Although we limit access to certain pages, please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the Services with whom you may choose to share your Meeting Records. Therefore, we cannot and do not guarantee that your Meeting Records will not be viewed by unauthorized persons.

Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with our Services, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your use of the Services, including Website traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

The information we collect automatically is only statistical data and does not include personal information. It helps us to improve our Services and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Services according to your individual interests.
- Speed up your searches.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Services. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Services.
- **Web Beacons.** Pages of our Website and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit Scribbl, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

We do not collect personal information automatically, but we may tie non-personal information collected automatically to personal information about you that we collect from other sources or that you provide to us.

Information We Receive From Third Party Platform

When you connect third party platforms, apps or providers (such as Google Meet; Gmail Account or Google Calendar) to our Services, or when you register through a third party account (such as Google), we receive personal information that includes your username, profile picture, email address, time, location, calendar information, contact information from such third parties and any information you choose to upload to such third party platforms.

How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Website and its contents to you.
- To provide you with our Services.
- To fulfill any other purpose for which you provide it; such as to prepare the Meeting Records.
- To provide you with notices about your account and/or subscription, including expiration and renewal notices.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Website or Services; including product news or updates that may be of interest to you.
- To allow you to participate in interactive features of our Services.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

Data Use and Confidentiality

In our commitment to respecting and protecting your privacy, we want to assure you that the Personal Information and Meeting Records you provide through the use of our Services are solely for the purpose of delivering the services you have requested. Specifically, Scribbl, Inc. does not use the data from your meetings to train machine learning models or any other software algorithms for the benefit of any clients other than you. Your meeting data is unique to your account and will not be utilized to enhance or improve service offerings to other clients, ensuring your data's integrity and confidentiality are preserved. This practice is part of our commitment to upholding the highest standards of data privacy and security.

Disclosure of Your Information

We may disclose personal information that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Scribbl's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in

which personal information held by Scribbl about our Service users is among the assets transferred.

- To fulfill the purpose for which you provide it. For example, if you give us an email address to use the "invite a friend" feature of our Services, we will transmit the contents of that email and your email address to the recipients.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our Terms of Service and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Scribbl, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some of our Services may then be inaccessible or not function properly.
- **Promotional Offers from Scribbl.** If you do not wish to have your email address used by the Scribbl to promote our own or third parties' products or services, you can opt-out by the unsubscribe link provided in those emails or by sending us an email stating your request. If we have sent you a promotional email, you may send us a return email asking to be omitted from future email distributions.

Accessing and Correcting Your Information

You may send us an email to request access to, correct, or delete any personal information that you have provided to us. We cannot delete your personal information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

If you request that we delete your Meeting Records, copies of your Meeting Records may remain viewable in cached and archived pages, or might have been copied or stored.

Retention of Personal Information

Scribbl stores all personal information for as long as necessary to fulfill the purposes set out in this policy, or for as long as we are required to do so by law or in order to comply with a regulatory obligation. When deleting personal information, we will take measures to render such

personal information irrecoverable or irreproducible, and the electronic files which contain personal information will be permanently deleted.

Legal Basis for Processing

We will only collect and process your information when we have a legal basis to do so. You also have choices about our use of your information as explained in this policy.

Your State Privacy Rights

State consumer privacy laws may provide their residents with additional rights regarding our use of their personal information. California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Montana, Oregon, Tennessee, Texas, Utah, and Virginia provide (now or in the future) their state residents with rights to:

- Confirm whether we process their personal information.
- Access and delete certain personal information.
- Correct inaccuracies in their personal information, taking into account the information's nature processing purpose (excluding Iowa and Utah).
- Data portability.
- Opt-out of personal data processing for:
 - targeted advertising (excluding Iowa);
 - sales; or
 - profiling in furtherance of decisions that produce legal or similarly significant effects (excluding Iowa and Utah).
- Either limit (opt-out of) or require consent to process sensitive personal data.

The exact scope of these rights may vary by state. To exercise any of these rights please contact us.

Nevada provides its residents with a limited right to opt-out of certain personal information sales. Residents who wish to exercise this sale opt-out rights may submit a request to this designated address: mike@scribbl.co. However, please know we do not currently sell data triggering that statute's opt-out requirements.

Your GDPR Rights

You as a data subject have many possibilities to impact how your personal information is being processed. You can:

- Request access to your personal information we process.
- Withdraw your consent if our use of your personal information is based on consent.
- Request that your information to be deleted or for you to be forgotten (right to erasure).
- Request that we correct or change your personal information.
- Limit, restrict or object to our use of your personal information.
- Access your personal information and/or receive it in a machine readable form.

- Subject to applicable law lodge a complaint with your local data protection authority.

Please note that if you request to remove your personal information, we may retain some of the information for specific reasons, such as to resolve disputes, troubleshoot problems, and as required by law. Furthermore, some personal information is never completely removed from our databases due to technical constraints and the fact that we regularly back up our systems. Therefore, not all of your personal information will ever be completely removed from our databases.

Data Security

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out or making copies of Meeting Records.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

Cross-Border Data Transfers

To facilitate our global operations, the personal information we collect from you will be transferred, stored and processed in the US. Laws in those countries may differ from the laws applicable to your country of residence. Where we transfer, store and process your personal information outside of the EEA or the UK we will ensure that the appropriate safeguards are in place to ensure an adequate level of protection such as through acceding to the Standard Contractual Clauses. Further details regarding the relevant safeguards can be obtained from us on request.

Subprocessors

Scribbl collects and processes data for the purpose of providing, monitoring and maintaining the Services. Where necessary, Scribbl will share this data with third parties used to provide the Services, including:

Name	Location	Purpose
Stripe	USA	Payment processing
AWS	USA	Cloud Platform

Name	Location	Purpose
Heroku	USA	Application content, email address, IP address
MailJet (Sinch)	USA	Email Gateway Provider
OpenAI OpCo, LLC	USA	AI writing assistant
Amplitude	USA	Website usage metrics & reporting

Changes to Our Privacy Policy

It is our policy to post any changes we make to our privacy policy on this page with a notice that the privacy policy has been updated on the Website home page. If we make material changes to how we treat our users' personal information, we will notify you by email to the primary email address specified in your account. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

Contact Information

To ask questions or comment about this privacy policy and our privacy practices, contact us at:

73 Center Street

Andover, Massachusetts 01810

mike@scribbl.co