



KLARITY PRIVACY POLICY

Last updated: Jun 18, 2022 .

Klarity Intelligence, Inc., a Delaware corporation located at 564 Market Street, Suite 316, San Francisco, CA 94104 (“**Klarity**”, “**us**”, “**we**”, or “**our**”) develops and provides a range of services (“**Services**”). We are committed to protecting your fundamental data privacy rights and making our data processing practices safe and fair.

Please read this Klarity Privacy Policy (“**Privacy Policy**”) carefully to learn how we collect, use, share and otherwise process information and to learn about your rights regarding your personal information. By accessing or using the Services or otherwise providing your information to Klarity, you agree to this Privacy Policy.

To exercise your rights regarding your personal information, or if you have any questions about this Privacy Policy, please contact us:

- By email: hello@klaritylaw.com.
- By phone number: (415) 463-3330.

We change this Privacy Policy from time to time. We will indicate the date the last changes were published and notify you of any significant changes with a more prominent notice.

1. DATA GOVERNED BY THIS PRIVACY POLICY

This Privacy Policy applies to our processing of personal information (as defined under U.S. and EU data privacy law) that we collect from any source, including the Services, our websites, and third parties.

This Privacy Policy does not apply to any websites, applications, or services offered by third parties that may be linked from our Services or websites or the information practices of other businesses, organizations and individuals that advertise or refer our Services. We are not responsible for the privacy practices of any third parties or the content of linked websites or applications.

2. DATA COLLECTION

A. DATA RECEIVED DIRECTLY FROM YOU

When you visit our websites or use our Services, you may provide us with information such as your name, workplace, position, email address, phone number, and address, signature, username and password. Certain information including username and password is required in order to create an account with our Services.

As is true with most websites and online services, we gather certain technical data when you visit our websites or use our Services. We may do so with the help of third parties and through “cookies” and other tracking technologies. That data mainly consists of usage data such as device, network, and location data, including IP



addresses, date/time stamps, heatmaps and scrolls, and activity (clicks, browsing, zooms and other interactions). We may connect this technical data to personal information gathered elsewhere. In that case, we treat the combined information in accordance with this Privacy Policy.

If you want to learn more about what cookies we use and what we use them for, please visit our Cookie Policy.

You may provide us with personal information such as your name, address, phone number and email address when you register for or participate in one of our sponsored events, forums or webinars.

You may provide us with information such as your name, address, phone number, email address, workplace or position by communicating with us by email, phone or mail, in visits to our offices or through our website.

We do not currently commit to responding to “do not track” or “DNT” signals with respect to our Services.

B. DATA RECEIVED FROM CUSTOMERS

When our customers use our Services, they may provide us with information such as names, workplaces, positions, contact details (such as e-mail, phone, and address), signatures, usernames and passwords.

Our customers use our Services to find information in documents and third party applications. This information may include the personal information of other individuals, even if they are not employees of the customer who provided us with the information. For example, if you signed a contract with one of our customers, your name may be collected from that contract.

Customers may provide us with information such as the names, addresses, phone numbers, email addresses, workplaces or positions of their personnel and auditors by communicating with us by email, phone, or mail, through our website, or in visits to our offices.

C. DATA RECEIVED FROM THIRD PARTIES

We collect personal information from trusted third parties such as marketing partners, researchers, and event organizers, and from publicly accessible sources such as government databases. We may also receive contact and professional details (e.g., your name, company, position, contact details and professional experience, preferences, and interests) from business partners, services providers and networking tools such as LinkedIn.

3. CHILDREN'S DATA

Our Services are not intended for children. We do not knowingly collect personal information of children under the age of 16. If you are under the age of 16, do not use our Services, share any information on our Services or provide any information about yourself to us. If we learn that we have collected personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe that we might have personal information of a child under the age of 16, please notify us immediately by email at hello@klaritylaw.com.



4. DATA USE

We use personal information we collect for various purposes:

- To detect, prevent and respond to security threats and illegal, fraudulent, or malicious activity;
- To provide, maintain, and improve our Services;
- To measure and understand how our Services are used;
- To develop new products, features and technologies;
- To provide customer support and respond to issues that you report to us;
- To communicate with you about your account or subscription, news, special offers and general information about other goods, services, and events.

We may rely on the following legal bases to process your personal information:

- **Consent.** We may process your information if you have given us permission (i.e., consent) to use your personal information for a specific purpose. You can withdraw your consent at any time by sending an e-mail to hello@klaritylaw.com.
- **Legitimate Interests.** We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests are not outweighed by your interests and fundamental rights and freedoms.
- **Legal Obligations.** We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.
- **Vital Interests.** We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party.

5. DATA RETENTION

The ability to establish a strong and secure audit trail is one of the most valuable functions of our Services. Therefore, we retain information when necessary for legitimate business or legal purposes, such as security, fraud and abuse prevention, or financial recordkeeping.

6. DATA TRANSFER

Regardless of where your personal information is processed, we apply the same protections described in this Privacy Policy. If we collect information outside the United States, we transfer it into the United States and process it there. The data privacy laws of the United States may differ from those of your country.

7. DATA DISCLOSURE



Our customers use our Services to review and analyze information. In order to do that, their employees, agents and other authorized persons must have access to that information. All users are subject to strict technical controls so that they only have access to the information they are authorized to access.

We may also disclose information:

- To our subsidiaries and affiliates;
- If we or our subsidiaries are involved in a merger, acquisition, or asset sale;
- To our business partners to offer you certain products or services;
- To trusted third party service providers to facilitate our Services and perform services on our behalf. These service providers are obligated not to disclose or use it for any other purpose;
- To satisfy applicable laws, court orders, or regulations;
- In connection with actual or suspected illegal activity, fraud, or other wrongdoing;
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Klarity, our customers, or others.

8. DATA SECURITY

We are dedicated to the protection of the information that flows through our Services. All Klarity products are built with strong security features to protect your information and all personal information is encrypted while in transit. Unfortunately, no method of transmission or storage is 100% secure. While we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

We restrict access to personal information to our employees, contractors, and agents who need that personal information in order to process it. Anyone with this access is subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

9. YOUR RIGHTS

To exercise your rights regarding your personal information, or if you have any questions about this Privacy Policy, please contact us by email at hello@klaritylaw.com or by telephone at (415) 463-3330.

You may opt out of receiving marketing communications with us by contacting us using the details above or by following the “unsubscribe” instructions in our marketing communications.

We will need to verify your identity before completing a rights request. This may include requiring you to provide more information to match with our records or, if you are using an agent to make a rights request, requiring written authorization from you.

We are not able to provide the Services without some necessary data.

A. EEA, SWITZERLAND, AND UK INDIVIDUALS



If you are a resident of the European Union (EU) and European Economic Area (EEA), you have certain data protection rights covered by GDPR, including the right to complain to a Data Protection Authority about our collection and use of your personal information. For more information, please contact your local data protection authority in the EEA.

In certain circumstances, you may request:

- To access, update or to delete certain of your personal information;
- To have your personal information updated if it is incorrect or out of date;
- To object to our processing of your personal information;
- To prevent the processing of your personal information for direct marketing purposes;
- To restrict the processing and disclosure of certain of your personal information;
- To transfer your personal information to another service provider;
- To revoke your consent for the processing of your personal information.

B. CALIFORNIA RESIDENTS

We do not sell personal information. Nor do we provide personal information to third parties to advertise or market non-Klarity products to you. We will share personal information with trusted third parties who assist us with providing the Services, such as marketing and analytics providers.

We collect these categories of personal information:

- Identifiers;
- Internet activity information;
- Professional and employment-related information;
- Education information;
- Inferences drawn from any of the above information categories.

We use personal information we collect for the purposes described in Section 4 of this Privacy Policy.

California law grants state residents certain rights. In certain circumstances, you may request:

- To access specific types of personal information;
- To request information about how we process personal information;
- To request deletion of personal information;
- To not be discriminated against for exercising these rights.