# **Privacy Policy**

This Privacy Notice elucidates how PostGuard ("PostGuard", "we", "our", "us") gathers, utilizes, and disseminates information in relation to your usage of our websites (including postguard.io), services, products and applications (collectively known as the "Services"). This Privacy Notice (the "Privacy Notice") does not pertain to information that our customers may process when availing our Services.

We may accumulate and receive information about users of our Services ("users", "you") from several sources, including: (i) information you offer through your user account on the Services (your "Account") when you sign up for the Services; (ii) your utilization of the Services; and (iii) from third-party websites, services, and partners.

We encourage you to peruse this Privacy Notice thoroughly to ensure you are fully cognizant of its contents. If you have any queries about this Privacy Notice or PostGuard's practices of data collection, utilization, and disclosure, please get in touch with us at <u>info@postguard.ai</u>

### The information we collect

Data you provide:

- Account registration. Upon registering an Account, we may request your contact details, including elements such as name, company name, address, email address, and phone number. If you opt to refer a friend to our Services, we may also accumulate your friend's email address to send them a referral or promotional code for signing up to our Services.
- Correspondences. If you interact with us directly, we may gather additional information about you such as your name, email address, phone number, the contents of the message and/or attachments you may send us, and any other information you may opt to provide. We may also receive a confirmation when you open an email from us.

The personal information you are asked to supply, and the reasons why you are asked to provide it, will be clarified when we request you to submit your personal information.

Data we collect when you use our Services:

Cookies and other tracking information. In line with most websites, we accumulate certain information automatically from your device. This data may include IP address, geo-location, browser type, operating system, date/time stamp, and referring URL. To gather this data, a cookie may be set on your computer or device when you access our Services. Cookies contain a minuscule amount of information that allows our web servers to recognize you. We store information that we gather through cookies to record your preferences. We may also automatically collect data about your use of

features of our Services, about the functionality of our Services, frequency of visits, and other data related to your interactions with the Services. We may track your use across different websites and services. In some countries, including countries in the European Economic Area ("EEA"), the information referred to above in this paragraph may be deemed personal information under relevant data protection laws.

• Search information. In order to render the Services, we collect and process on behalf of our users some information regarding their searches on the platform.

#### Information, we obtain from third-party sources

- Third-party accounts. Should you opt to associate our Services with a third-party account, we will receive data about that account, such as your authentication token from the third-party account, to validate the connection. If you aim to restrict the data accessible to us, you should visit the privacy configurations of your third-party accounts to explore your alternatives.
- Third-party partners. We may also obtain openly available data about you from our third-party associates and merge it with the data that we have about you.

#### How do we employ the information?

We use the information we amass in various manners, such as:

- To deliver, operate, and sustain our Services;
- To enhance, customise, and broaden our Services;
- To comprehend and analyse your utilisation of our Services;
- To create new products, services, features, and functionality;
- To interact with you, either directly or via one of our partners, inclusive of customer service, to provide you with updates and other data relating to the Service, and for marketing and promotional purposes;
- For compliance objectives, including enforcing our Terms and Conditions, or other legal rights, or as may be mandated by applicable laws and regulations or requested by any judicial procedure or governmental agency.

#### How do we share information?

The information we amass may be distributed in various manners, including the following:

• Third-party vendors and service providers. We may share data with third-party vendors and service providers that offer services on our behalf, such as aiding in providing our Services, for promotional and/or marketing objectives, and to present you with pertinent data like product notifications, software updates, special offers, or other data.

- Aggregate data. Where legally permissible, we may utilize and share data about users with our associates in an aggregated or anonymised form that can't reasonably be used to identify you.
- Referral registration. If you register for our Services through a recommendation from a friend, we may share data with your recommender to let them know that you used their referral to register for our Services.
- Analytics. We employ analytics providers such as Google Analytics. Google Analytics uses cookies to amass non-identifying information. Google offers some additional privacy options regarding its Analytics cookies at <u>http://www.google.com/policies/privacy/partners/</u>.
- Business Transfers. Data may be revealed and otherwise transferred to any potential acquirer, successor, or assignee as part of any proposed merger, acquisition, debt financing, sale of assets, or similar transaction, or in the event of insolvency, bankruptcy, or receivership in which data is transferred to one or more third parties as one of our business assets.
- As Mandated By Law and Similar Disclosures. We may also disseminate data to (i) satisfy any applicable law, regulation, legal process, or governmental request; (ii) enforce this Privacy Policy and our Terms and Conditions, including investigation of potential violations hereof; (iii) detect, prevent, or otherwise address fraud, security, or technical issues; (iv) respond to your requests; or (v) safeguard our rights, property or safety, our users and the public. This includes exchanging data with other companies and organisations for fraud protection and spam/malware prevention.
- With Your Agreement. We may disseminate information with your consent.

#### How do we safeguard information?

- Personal details. PostGuard is dedicated to safeguarding your personal details. To achieve this, we use a range of security technologies and procedures designed to shield data from unauthorised entry, utilisation, or disclosure. The procedures we use are designed to deliver a level of security suitable to the risk of processing your personal information. However, it's important to remember that the Internet can never be guaranteed to be absolutely secure.
- Credit cards. We never request your credit card specifics. Neither do we store nor process them. All billing operations are conducted by a PCI DSS compliant third-party service of our choice acting on behalf of PostGuard.

#### How can you access your data?

If you're a registered user, you may access specific information related to your Account by logging into our Services or by utilizing our support widget.

To secure your privacy and security, we might also implement reasonable measures to confirm your identity before altering or removing your information. The data you share with us may be archived or periodically stored by us as per our standard backup processes for disaster recovery purposes. Your ability to access and amend your information might be

temporarily restricted where such access and modification could: impede PostGuard's compliance with a legal obligation; hinder PostGuard's ability to investigate, make, or defend against legal claims; lead to the disclosure of personal data about a third party; or result in the violation of a contract or disclosure of trade secrets or other proprietary business details belonging to PostGuard or a third party.

#### Services from third parties

You may reach other third-party services via the Services, for instance, by clicking on links to those third-party services from within the Services. We hold no responsibility for the privacy policies and/or practices of these third-party services, and we recommend you to thoroughly review their privacy policies.

# COPPA (Children's Online Privacy Protection Act)

PostGuard consciously refrains from collecting data from children under the age of 18, and usage of our Services is forbidden for those under 18. If you discover that a child has provided us with personal information in breach of this Privacy Policy, you can inform us using the support widget.

# GDPR (General Data Protection Regulation)

If you are a resident of the EEA, you are granted the following data protection rights:

- Rights to access, rectification, and deletion. If you desire to access, correct, update, or request removal of your personal data, you can do so at any time by utilizing our support widget.
- Rights to object, limit processing, and data portability. Additionally, you can object to the processing of your personal data, request us to limit the processing of your personal data, or ask for the portability of your personal data. Once again, you can practice these rights by using our support widget.
- Opting out of marketing communications. You have the right to opt-out of marketing communications we send you at any point in time. You can practice this right by clicking on the "unsubscribe" or "opt-out" link in the marketing emails we send you.
- Withdrawal of consent. In the same way, if we have gathered and processed your personal data with your consent, you can withdraw your consent whenever you want. The withdrawal of your consent will not impact the legality of any processing we conducted prior to your withdrawal, nor will it affect the processing of your personal data conducted in reliance on legal processing grounds other than consent.

We respond to all requests we get from individuals wanting to exercise their data protection rights following applicable data protection laws.

# Fair Information Practices

The Fair Information Practices Principles are the foundation of privacy law in the United States and the principles they encompass have significantly influenced the development of data protection laws worldwide. Understanding the Fair Information Practice Principles and how they should be executed is crucial to comply with the various privacy laws that protect personal data.

To align with Fair Information Practices, we will take the following action in case of a data breach: we will notify you via email within 7 business days.

We also concur with the Individual Redress Principle which demands that individuals have the right to legally pursue enforceable rights against data collectors and processors who do not comply with the law. This principle requires not only that individuals have enforceable rights against data users, but also that individuals have recourse to courts or government agencies to investigate and/or prosecute non-compliance by data processors.

# CAN-SPAM Act

The CAN-SPAM Act is a regulation that stipulates the laws for business email, establishes criteria for commercial communications, grants recipients the autonomy to cease receiving emails, and highlights stringent penalties for infractions.

We gather your email address with the aim to:

- Dispatch details, answer inquiries, and/or cater to other requests or queries
- Carry out order processing and send updates concerning orders.
- Forward supplementary information pertinent to your product and/or service
- Conduct marketing activities on our mailing list or persist with sending emails to our customers following the initial transaction.

In accordance with the CAN-SPAM Act, we commit to the following:

- Avoid the utilization of deceptive or incorrect subject lines or email addresses.
- Label the message as a promotional content in some reasonable manner.
- Incorporate the physical address of our commercial enterprise or site headquarters.
- Track third-party email marketing services to ensure compliance, if employed.
- Fulfill opt-out/unsubscribe requests promptly.
- Permit users to unsubscribe from our marketing mailing lists by utilizing the link at the end of every email.

Even if you choose to unsubscribe, we may continue to contact you for informative, transactional, account-related, or similar purposes.

# Alterations to this Privacy Policy

This Privacy Policy might undergo modifications periodically, so we urge you to review it regularly. Changes to this Privacy Policy will be made public on our websites. If we significantly alter the manner in which we use or share personal information previously obtained from you through our Services, we will inform you via our Services, by email, or other forms of communication.