

Privacy Policy

Version 2.0 – Effective April 1, 2026

At **Aclymate, Inc.** ("**Aclymate**," "**Company**," "**us**," or "**we**"), we recognize that your privacy is important. This Privacy Policy ("**Policy**") describes how we collect, use, share, and protect personal information when you visit our websites (collectively, the "**Site**"), use our cloud-based platform ("**Platform**") and related services (collectively, the "**Services**"), or otherwise interact with us.

This Policy is designed to be read together with our Master Services Agreement (available at aclymate.com/terms) and our Data Processing Addendum (available at aclymate.com/dpa). If you are a business customer of Aclymate, the Data Processing Addendum governs our processing of personal data on your behalf and takes precedence over this Policy to the extent of any conflict. If you are an individual who uses our Services in the course of your employment by one of our business customers, this Policy applies to your personal information.

If you have questions about this Policy or our privacy practices, please contact us at: privacy@aclymate.com.

1. INFORMATION WE COLLECT

We collect personal and business information in the following categories, depending on how you interact with us:

1.1 Information You Provide Directly

When you register for an account, subscribe to a Service, contact us, apply for a job, or otherwise interact with us, you may provide information such as: company name, email address, mailing address, phone **number**, **job** title and department. If you are a business customer, we anticipate that you may provide similar information pertaining to your employees, along with names of employees and authorized contacts, and payment-related information (processed securely through Stripe – see Section 4 below).

1.2 Business and Operational Data

To deliver our carbon accounting and emissions analysis Services, we collect and process business data that business customers provide or make available through the Platform, which may contain or reflect personal information about individuals, including: financial transaction records and expense data, utility account information and energy consumption data, vehicle types, mileage logs, and fleet data, flight and travel records, corporate rideshare account data, vendor and supplier information, and other operational data relevant to emissions calculations. Some of this may be considered “sensitive personal information” under applicable law.

1.3 Data from Third-Party Integrations

If your business connects financial accounts, accounting platforms, or other data sources through our Platform (for example, via Plaid or QuickBooks/Intuit), you authorize us to access certain account and transaction data through those integrations. We access this data in read-only

mode — we do not make changes to your bank accounts, bookkeeping records, or other connected systems. You control which integrations are connected and may disconnect them at any time through the Platform or by contacting us. Once disconnected, we will no longer pull new data from that integration. Data previously imported will be handled in accordance with this Policy and our data retention practices described in Section 6.

1.4 Automatically Collected Information

When you visit our Site, we may automatically collect technical and usage information, including: your IP address and general location, browser type and version, operating system, referring and exit URLs, pages visited and time spent on our Site, and device identifiers. Some of this information may be considered “personal information” under applicable data privacy laws.

1.5 Cookies and Tracking Technologies

We use cookies and similar technologies to monitor site usage, store account preferences, personalize your experience, and analyze the performance of our Site and marketing efforts. You can manage cookie preferences through your browser settings. Please note that disabling cookies may affect certain functionality of the Site. For more information on opting out of interest-based advertising, you may visit: the NAI's opt-out platform (networkadvertising.org/choices), the EDAA's opt-out platform (youronlinechoices.com), or the DAA's opt-out platform (optout.aboutads.info).

Please note that our third-party providers and partners (including Google, ZoomInfo, and OpenAI, for example) may also place cookies or other technologies to track users on our Site, including for their own marketing purposes and to personalize and serve ads to you on our behalf. We do not control the trackers placed by any third party, nor the information they collect and how they use it.

2. HOW WE USE INFORMATION

We use the information we collect for the following purposes:

Delivering the Services. Calculating carbon footprints, generating emissions reports, tracking sustainability progress, facilitating carbon offset purchases, and performing Turn Key climate bookkeeping tasks on behalf of our business customers.

Operating and Improving the Platform. Maintaining, securing, and enhancing the Platform and Site, analyzing usage patterns, troubleshooting issues, and developing new features.

AI-Powered Features. Certain features of the Services use artificial intelligence (including services provided by Anthropic/Claude) to assist with data analysis, emissions calculations, and integration development. When AI technologies process your data within the Platform, they do so solely to deliver the Services and for our use in creating aggregated and anonymized data as discussed below. Your data is not used to train general-purpose AI models. See Section 4 for more information on our AI sub-processors.

Communication. Sending you service-related notices, responding to your inquiries, providing customer **support**, and delivering administrative updates.

Aggregated and Anonymized Analytics. Creating aggregated and anonymized data from use of the Platform (which does not identify you or any individual) for industry benchmarking, product improvement, and reporting on climate trends.

Legal Compliance. Complying with applicable laws, regulations, and legal processes, and enforcing our rights and agreements.

Marketing (with your consent). If you have opted in, we may send you

information about new products, services, or features that we believe may interest you. You may opt out at any time by updating your account preferences or contacting us.

3. TURN KEY SERVICE — ADDITIONAL BUSINESS DATA HANDLING

If you subscribe to our Turn Key Service, Aclymate personnel will access and process your business data directly in the course of performing climate bookkeeping tasks. This may include accessing data within the Platform, processing data you share via email or other channels, and generating reports and analyses on your behalf. All Turn Key Service personnel are bound by written confidentiality obligations, receive training on data handling procedures, and access your data only through the Aclymate Platform on a need-to-know basis. Data received via email or other channels outside the Platform is treated with the same protections as data processed through the Platform. For more detail on our data processing obligations in connection with the Turn Key Service, please refer to our Data Processing Addendum at aclymate.com/dpa.

4. HOW WE DISCLOSE INFORMATION

We do not rent, or trade your personal data to third parties, although we may “sell” or “share” it within the meaning of certain data privacy laws. See information below about how to opt out of sale or sharing of personal data. We disclose information only in the following circumstances:

Service Providers and Sub-Processors. We work with trusted third-party service providers who assist us in delivering the Services. These providers

process data on our behalf and under our instructions, subject to contractual data protection obligations. Our current service providers include:

Provider	Purpose	Privacy Information
Google Cloud / Firebase	Data storage, hosting, platform infrastructure	firebase.google.com/support/privacy
Stripe, Inc.	Payment processing (Aclymate does not receive or store credit card or bank account numbers)	stripe.com/privacy
Plaid, Inc.	Financial account connectivity (read-only)	plaid.com/legal
Intuit / QuickBooks	Accounting platform integration (read-only)	intuit.com/privacy/statement
Twilio / SendGrid	Transactional email delivery	twilio.com/legal/privacy
Anthropic (Claude)	AI-powered data analysis, emissions calculations, and platform features	anthropic.com/privacy
CNaught	Carbon offset marketplace and procurement	cnaught.com/privacy
Mixpanel	Data Analytics Services	mixpanel.com/privacy

A complete and current list of sub-processors is maintained at aclymate.com/sub-processors.

Aggregated and Anonymized Data. We may share aggregated, anonymized data from the Platform that does not identify your business or any individual for purposes such as industry benchmarking, climate trend reporting, and offset retirement. For example, your total emissions profile may be combined with other emitters into an anonymized total for offset retirement purposes.

Customer-Authorized Third Parties. If you authorize third-party consultants to access your data through the Platform (for example, for regulatory compliance work), we will provide access as directed by you. See our Data Processing Addendum (Section 5.5) for details.

Legal Requirements. We may disclose information if required by law, regulation, court order, or subpoena, or if we believe in good faith that disclosure is necessary to protect our rights or the rights of others, protect your safety or the safety of others, investigate fraud, or respond to a government request.

Business Transfers. In the event of a merger, acquisition, or sale of all or a portion of our assets, your information may be transferred as part of that transaction.

5. DATA SECURITY

We take the security of your business data seriously and implement administrative, technical, and physical safeguards appropriate to the nature of the data we process through the Platform. These measures include: encryption of data in transit (TLS 1.2 or higher) and at rest (AES-256 or equivalent), role-based access controls limiting data access to authorized personnel, regular security assessments and vulnerability reviews, intrusion

detection and monitoring systems, documented incident response procedures, and regular data backups with tested restoration procedures.

Aclymate maintains appropriate insurance coverage, including cyber liability and errors & omissions (E&O) policies. Customers may request a certificate of insurance in accordance with the terms of the Data Processing Addendum.

While we strive to protect your information, no method of transmission over the Internet or electronic storage is completely secure. We cannot guarantee absolute security, and you use the Platform and Site at your own risk.

6. DATA RETENTION AND DELETION

We retain your business information for as long as your account is active or as needed to provide the Services. Specific retention practices include:

Active Accounts. We retain your data for the duration of your subscription and as necessary to deliver the Services you have requested.

After Termination. Upon termination or expiration of your subscription, you will have sixty (60) days to export your data from the Platform. Following the export period, we will delete your data from production systems within sixty (60) days and use reasonable efforts to remove it from backup systems within one hundred eighty (180) days.

Inactive Accounts. Accounts that have not maintained an active subscription and remain inactive for more than six (6) months (180 days) may be removed.

Aggregated and Anonymized Data. Data that has been aggregated and anonymized (so that it does not identify you or any individual) may be retained and used indefinitely for analytics, benchmarking, and reporting purposes.

With respect to personal data gathered through use of the Site, we retain it for as long as needed for the reason it was collected.

Legal Obligations. We may retain information as required by applicable law, regulation, or legal obligation, or as necessary to verify compliance with our agreements.

7. YOUR RIGHTS AND CHOICES

7.1 All Users

Regardless of your location, you have the following rights:

Access and Correction. You may access and update your personal information at any time through your account settings in the Platform, or by contacting us at privacy@aclymate.com.

Deletion. You may request deletion of your personal information by contacting us. Please note that some information may be retained as described in Section 6.

Communication Preferences. You may opt out of marketing communications at any time by updating your account preferences or contacting us.

Service-related communications (such as billing notices and security alerts) are not subject to opt-out.

Data Portability. You may export your data from the Platform in standard formats (CSV, Excel, PDF, JSON) at any time during your active subscription.

7.2

Rights Under the Laws of Certain States

Residents of several states may have rights regarding their personal information gathered through the Site or Platform: the right to access your personal data; the right to correct inaccuracies; the right to request deletion; the right to data portability; and the right to opt out of targeted advertising, sale of personal data, or profiling. To exercise these rights, contact us at privacy@aclymate.com. You may appeal any decision we make regarding your request by contacting us at the same address.

8. CHILDREN'S PRIVACY

Our Site and Services are not directed to individuals under the age of 18. We do not knowingly collect personal information from minors. If we become aware that we have inadvertently collected personal information from an individual under the age of 18, we will take steps to delete such information promptly.

9. CHANGES TO THIS POLICY

We may update this Policy from time to time to reflect changes in our practices, Services, or applicable law. When we make material changes, we may notify you by sending a notice to the email address associated with your account and by posting an updated version on our Site. The "Effective" date at the top of this Policy indicates when the most recent revision took effect. Your continued use of the Site or Services after any change constitutes your acceptance of the updated Policy.

10. CONTACT US

If you have questions, concerns, or requests regarding this Privacy Policy or our privacy practices, please contact us:

Aclymate, Inc. 1888 Sherman Street, Suite 220 Denver, CO 80203 Attn: Privacy
Email: privacy@aclymate.com

11. RELATED DOCUMENTS

This Privacy Policy is part of Aclymate's suite of Agreement Documents. For more information on how we handle your data, please refer to:

Document	Location
Master Services Agreement	aclymate.com/terms
Data Processing Addendum	aclymate.com/dpa
Service Level Agreement	aclymate.com/sla
Sub-Processor List	aclymate.com/sub-processors

This Privacy Policy is effective as of the date stated above and applies to all users of the Aclymate Site and Services.

[END OF PRIVACY POLICY]