PRIVACY POLICY

Last Updated: October 14, 2026

The privacy and security of your information is important to us. This Privacy Policy explains how KYRO Technologies, Inc. ("KYRO", "we," "our," or "us") collects, uses, and shares your information. This privacy policy applies to information collected by us through any means, including through our websites https://app.kyro.ai, https://kyro.ai, and https://storm.kyro.ai (Storm Call Center), our social media pages, the KYRO mobile application, and any other software, products, or services offered by KYRO (collectively, "Sites"), and from customers who purchase our services.

This Privacy Policy does not apply to personal information that we process on behalf of our business customers under a data processing agreement, such as information a customer uploads about its employees and crews to its KYRO account. That information is governed by our agreement with the customer and by the customer's own privacy notice; please contact that customer with questions about it.

By visiting, accessing, or using our Sites, purchasing our services, or by providing information to us, you consent to our collection, use, storage, and sharing of your information as described in this Privacy Policy. If you disagree with anything in this Privacy Policy, you should not visit, access, or use our Sites or provide your information to us.

Our Sites are intended for individuals 18 years of age or older. If you are under 18, please do not use our Sites and do not send us any information about yourself.

If you are a resident of California or another U.S. state with a comprehensive privacy law, you may have additional rights as described below in the section entitled "U.S. STATE PRIVACY RIGHTS."

If you are outside the United States, by using our Sites or by providing your information to us, you acknowledge that your Personal Information will be transferred to and processed in the United States and in other countries where we and our service providers operate, including India, as described below. Specific additional rights may apply where required by applicable law.

INFORMATION WE COLLECT

We collect certain information that identifies, relates to, describes, and is reasonably capable of being associated with a particular individual ("Personal Information"). Personal Information does not include publicly available information in government records or de-identified, anonymized, or aggregated consumer information.

We collect Personal Information and other information from or about you in a few different ways. Specifically, we may collect or receive information: (1) directly from you through information you provide; (2) indirectly from you by observing your actions on our website; and (3) from third parties such as Google, Facebook, X (formerly Twitter), LinkedIn, data enrichment providers, and website visitor identification providers. Each of these is discussed in more detail below.

Information You Provide

You may provide information to us in a number of ways:

- When you purchase our services, you will typically provide your name, telephone number, business address, and billing information, and you may also provide payment card information and tax identification number.
- When you contact us, the email address and/or telephone number you use to communicate with us generally will be collected and any additional information you provide may also be collected.
- When you sign up for our mailing list, we will collect your name, email and/or mailing address.
- If you submit an inquiry through our website, we will generally collect your name, email address, telephone number, and any other information you provide.
- If you post information on our social media pages, that information may be collected and used by us (as well as other users of those sites and the public generally). Please do not post any information on any site that allows strangers to identify or locate you or that you otherwise do not want to share with the public.
- When you create an account or use the KYRO mobile application, we collect your name, email address, mobile phone number, employer, trade or craft, work history, licenses and certifications, availability, profile photo, and any other information you add to your profile.
- When you use our community and social features, we collect the posts, photos, videos, comments, and messages you share.
- When you apply for KYRO Verified, we collect images of your government-issued identification (which include your identification number, date of birth, and photograph) and copies of your licenses and certifications. We retain identification images for as long as your account is active.
- If you apply for or use KYRO Capital, we collect business information (such as legal name, trade name, addresses, tax identification number, and accounts payable or receivable contacts), invoice and transaction information, and, for any individual who guarantees a KYRO Capital account, that individual's name, home address, Social Security number, and date of birth. We transmit this information to the third-party bank or credit provider that provides KYRO Capital and is identified in your application materials (a "KYRO Capital Provider").
- When you use voice features, we collect audio recordings and transcripts of what you say.
- When you provide your mobile number for text messages, we use it to send transactional messages such as one-time passcodes, alerts, and callout notifications. We do not send marketing text messages.
- When you submit a resume or application for employment, any information you provide will be collected and we may also obtain additional information through references, former employers, background checks, and credit reports.

Our primary systems are hosted in the United States. Personal Information may also be accessed and processed by our wholly owned subsidiary in India, which provides engineering and support services for KYRO, and by service providers located in other countries, under contractual safeguards. If you are located outside the United States, your Personal Information will be processed in the United States and these other countries, whose privacy laws may differ from those where you live.

Information Indirectly Collected from You

Cookies and Other Technologies. We automatically collect information from you using cookies and other technologies on our website.

Cookies are small text files offered to your computer by servers in order to keep track of your browser as you navigate our website. We may use cookies and similar technologies to identify who you are and may use them when you visit our website, click on our ads, or click on links in our emails. Cookies also enable us to remember your user preferences for our website. Cookies and other technologies may also be used for site maintenance and analysis, performing network communications, authenticating users, serving contextual advertisements, and protecting against fraud and theft. You can block or remove

cookies using your Internet browser's settings. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences. If you block or remove cookies, you may not be able to perform certain transactions, use certain functionality, and access certain content on our website.

We use three primary types of cookies:

- Functional Cookies – These cookies support the use of the website and enable certain features to enhance your experience. For example, functional cookies remember your selections as you move from page to page.
- Performance Cookies – These cookies collect information needed to support the website and our applications and allow us to identify problems and improve the website – for example, performance cookies may provide us with information about how you came to our website and how you navigate through our website.
- Targeting Cookies – These cookies may be used to collect information from you to help us improve our products and services and to serve you with targeted advertisements that we believe are relevant for you.

Clear GIFs (a.k.a. web beacons, web bugs or pixel tags), are tiny graphics with a unique identifier, similar in function to cookies. Clear GIFs are embedded invisibly on web pages. We may use clear GIFs, in connection with our website to, among other things, track the activities of visitors, help us manage content, and compile statistics about usage of the website. We and our third party service providers also use clear GIFs in HTML emails to our client, to help us track email response rates, identify when our emails are viewed, and track whether our emails are forwarded.

"Do Not Track" is a privacy setting that users can set in certain web browsers. If turned on, this setting requests that website not track information about users. At this time, we do not respond to "Do Not Track" browser settings. We do, however, recognize Global Privacy Control (GPC) signals as a request to opt out of the sale or sharing of your Personal Information for the browser or device sending the signal.

Traffic Data. We automatically track and collect general log information when you visit our website, including your: (a) Internet Protocol (IP) address; (b) domain server; (c) operating system; and (d) type of web browser; and (e) the pages you visit on our website (collectively "Traffic Data"). We use the Traffic Data to report aggregated website activity and to better understand the needs of our users so we can make informed decisions regarding the content and design of our website. We may collect Traffic Data through various technologies including, but not limited to, cookies, IP addresses, and clear GIFs (Graphics Interchange Format, a software technology also known as a pixel tag).

Mobile Application Data. When you use the KYRO mobile application, we collect information about your device (such as device type, operating system, app version, and device identifiers) and how you use the app. With your permission, we also collect: precise location, only while the app is open and in use; photos and videos you choose to capture or upload; microphone input when you use voice features; and a push notification token. You can change these permissions at any time in your device settings.

Visitor Identification and Advertising. We use website visitor identification tools, such as RB2B, that may identify the business professionals who visit our website by matching information about their visit with professional profile data, and we use advertising pixels and targeting cookies to show you KYRO advertisements on other websites. These activities may be considered a "sale" or "sharing" of Personal Information, or "targeted advertising," under certain U.S. state privacy laws. You can opt out as described under "Your Privacy Choices."

Third Party Websites and Social Media Services. Our website may include links to third party websites or social media services where you may be able to post comments, reviews or other information. We may monitor comments and reviews regarding us, our products, or our Sites that you publicly post on social media or customer review sites. In addition, please note that your use of these third party websites or social media services may result in those sites collecting information about you. We are not responsible for these third party websites or social media services and you should review their privacy policies to make sure you understand the information that may be collected, used, and shared by those sites.

Information from Third Parties

Social Media Sites. To the extent you post information on our social media sites, we may collect such information. We may also receive Personal Information about you through certain social media sites such as Facebook, Instagram, and LinkedIn.

Third Party Analytics Services. We may work with third party analytics services such as Google Analytics and PostHog to help us understand how our Sites are being used, such as tracking the frequency and duration of use of website and social media pages. These analytics services may use cookies and other technologies to collect information about the content you view, what website you visit immediately prior to and after visiting our website, and your system information and geographic information. The information generated by these technologies about your use of sites may be transmitted to and stored by the applicable analytics services.

Categories of Information Collected

In the 12 months preceding the Last Updated date of this Policy, we have collected or received the following categories of Personal Information about consumers:

Category	**Examples of What We May Collect**	**Collected**
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol (IP) address, email address, account name.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, address, telephone number, employment. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	Age and sex, as shown on identification documents you upload for KYRO Verified.	YES
D. Commercial information.	Records of services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, such as DNA sequences, fingerprints, facial geometry, voiceprints, iris or retina scans, and sleep, health or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on an individuals's interaction with a website, application, or advertisement.	YES

G. Geolocation data.	Physical location or movements.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information. We collect audio recordings to simplify the process of capturing project updates.	YES
I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to an individual maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES
L. Electronic files created by you on Cloud storage services	We integrate with third party cloud providers (Google, Dropbox, Box, Microsoft) to enable you to access your files from within the Kyro platform. We may cache these files for fast and/or offline access.	YES
M. Sensitive personal information.	Government-issued identification numbers (such as driver's license numbers and, for KYRO Capital guarantors, Social Security numbers), precise geolocation, and account log-in credentials.	YES

HOW WE USE YOUR INFORMATION

We and our service providers may use Personal Information for the following purposes:

- To process orders from our customers and deliver services to our customers.
- To market and promote our products.
- To respond to your inquiries.
- To manage any contractual relationship between us.
- To present our website and related content to you.
- To evaluate and make improvements to our website or social media presences.
- To diagnose and fix problems with our website.
- To secure our website and to prevent or detect criminal, unlawful, or harassing actions or conduct.
- To provide product updates, news, and event information.

- If you apply for a job, to verify qualifications, previous employment, and to conduct background checks (as permitted by law).
- To provide any required reporting to governmental or regulatory entities.
- To verify identities, licenses, and certifications for KYRO Verified.
- To operate our community and social features, including moderating content and responding to reports.
- To send transactional text messages, push notifications, and service communications.
- To develop and improve our products, including to train and improve AI models using de-identified or aggregated information.
- To identify businesses that visit our website and to show KYRO advertisements on other websites.

On other occasions where we ask you for consent, we will use the information for the purposes we provide at that time. You have the right to withdraw your consent at any time; however, we may have other legal grounds for storing and/or using your information, including those identified above.

Google Workspace APIs are not used to develop, improve, or train generalized AI and/or ML models. We do not permit the third-party AI model providers we use to train their models on your Personal Information.

SHARING AND DISCLOSURE OF PERSONAL INFORMATION

We do not sell your Personal Information for money. However, our use of visitor identification tools and advertising pixels may be considered a "sale" or "sharing" of Personal Information under certain U.S. state privacy laws, as described above. We may share your Personal Information as follows:

- **Service Providers**. We may disclose Personal Information to third party vendors, contractors or agents who perform functions on our behalf ("Service Providers"). For example, we may contract with Service Providers to provide certain services, such as providing data storage and management, analytics services, marketing services, employee benefits services, payroll services, or payment processing services. We only provide our Service Providers with Personal Information necessary for them to perform these services on our behalf. Each Service Provider must agree to use commercially reasonable security procedures and practices, appropriate to the nature of the information involved, to protect your Personal Information from unauthorized acquisition, access, use, or disclosure. Service Providers may only use the Personal Information they obtain from us or collect on our behalf to provide services to us.
- **Other Users and Companies.** If you create a profile, the information you choose to make visible (such as your name, trade, certifications, KYRO Verified status, availability, and posts) may be visible to other users and to companies that use KYRO to find or engage field resources. Content you post in community features may be visible to other users.
- **AI Model Providers.** We share information with the AI model providers listed on our Subprocessor page to provide AI features. These providers may not use your Personal Information to train their models.

- **Text Messaging.** We do not share mobile phone numbers or text-messaging opt-in data with third parties or affiliates for their marketing or promotional purposes.

- **KYRO Capital.** If you apply for or participate in KYRO Capital, we share your application, invoice, and transaction information with the applicable KYRO Capital Provider so that it can evaluate applications and process transactions, and we receive account status information from that KYRO Capital Provider to display to you. Each KYRO Capital Provider's use of your information is governed by its own privacy policy. We do not sell or share information obtained through KYRO Capital with any other third party, except as required by law.

- **Business Transfers**. If we are acquired by, or merged with, another entity, if substantially all of our assets are transferred to another entity, or as part of a bankruptcy proceeding, or if we are evaluating or in negotiations with respect to any such transaction, we may transfer, or make available, the Personal Information we have collected from you to the other entity or resulting legal entity.

- **Legal Process**. We also may disclose the Personal Information we collect from you: to comply with applicable laws and regulations, a government investigation, a judicial proceeding, a court order, or other legal process (such as in response to a subpoena); or to respond to discovery requests or present evidence in a legal proceeding in which we are involved.

- **To Protect Us and Others**. We also may disclose the Personal Information we collect from you where we believe such disclosure is needed to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, suspected violations of this Privacy Policy, and suspected violations of any applicable terms and conditions.

- **Aggregated and De-Identified Information.** We may share aggregate or de-identified Personal Information with our service providers and/or affiliated companies for marketing, advertising, research, or similar purposes.

- **Job Applications.** If you apply for a job position, some of your Personal Information may be shared with third parties in order to confirm your education, work history, and references, and to obtain background checks and credit reports if permitted by law.

In the 12 months preceding the Last Updated dated of this Policy, we have disclosed the following categories of Personal Information for a business purpose as described above:

Category A: Identifiers.
Category B: California Customer Records personal information categories.
Category D: Commercial information.
Category F: Internet or other similar network activity.
Category G: Geolocation data.
Category H: Sensory data.
Category I: Professional or employment-related information.
Category M: Sensitive personal information (only to service providers acting on our behalf).
Category C: Protected classification characteristics (age and sex, from identification documents, shared only with the service providers that support verification).

DATA RETENTION

We keep Personal Information for as long as needed for the purposes described in this Privacy Policy, including to provide our services, comply with legal obligations, resolve disputes, and enforce our agreements. We determine how long to keep each category of Personal Information based on: the purposes for which we collected it; the nature and length of our relationship with you; our legal, tax, accounting, and regulatory obligations; our contractual obligations, including to our business customers and to KYRO Capital Providers; applicable statutes of limitations; and our need to resolve disputes, prevent fraud, and enforce our agreements. Applying these criteria, we keep account and profile information for as long as your account is active and for as long afterward as is reasonably necessary for these purposes; identification images collected for KYRO Verified while your account is active; KYRO Capital application and transaction records for as long as required by our agreements and applicable law; and marketing and website data for as long as reasonably necessary for marketing and analytics purposes. When Personal Information is no longer needed for these purposes, we delete or de-identify it.

CHILDREN'S PRIVACY

Our Sites and our products are intended for individuals 18 years of age or older and are not directed to children. We do not knowingly collect Personal Information from anyone under 18. If you believe a person under 18 has provided us with Personal Information, please contact us at privacy@kyro.us, and we will take reasonable steps to delete it.

YOUR PRIVACY CHOICES

You may opt-out of receiving email communications and other marketing materials from us (or any third-party email marketing service we may use) via links provided in each email (usually at the bottom of the email).

Opt Out of Sale, Sharing, and Targeted Advertising. Click the "Your Privacy Choices" link in the footer of our website, or enable a Global Privacy Control signal in your browser.

Cookies. Use the "Cookie settings" link in the footer of our website to manage non-essential cookies.

Text Messages. Reply STOP to any KYRO text message to stop receiving texts, or HELP for help.

Mobile Permissions. You can turn off location, camera, microphone, and push notification permissions in your device settings.

Account Deletion. You can delete your account at any time in the KYRO mobile application settings or by emailing privacy@kyro.us.

USER-GENERATED CONTENT

You may be able to post content on our social media pages and through community features in the KYRO mobile application, including comments, photos, videos, and other information. Content you post may be visible to other users or to the public, and we cannot prevent others from using it in ways that may violate this Privacy Policy, applicable law, or your personal privacy. Please carefully consider your content before posting, and do not post anyone else's personal information without permission. Content is subject to removal if we determine, in our sole discretion, that it violates our Terms of Service or Community Guidelines, any applicable law, poses a security risk, infringes the rights of someone else, or constitutes a threat, defamation, or harassment.

LINKS TO THIRD PARTY WEBSITES OR PLATFORMS

Our website may contain links to third party websites or platforms. These links are provided for your convenience. We are not responsible for and have no control over the content on these other websites or platforms. The inclusion of a link on our website is not an endorsement. Please note that when you click on one of these links, you will leave our website and will be subject to the policies and privacy practices of the other website or platform, which may differ significantly from our Privacy Policy. Please review such third parties' privacy policies before providing any Personal Information to them.

We make no representations or warranties, express or implied, regarding the content of any of these linked websites or platforms. WE EXPRESSLY DISCLAIM ANY AND ALL LIABILITY FOR YOUR INTERACTION WITH SUCH THIRD PARTY WEBSITES OR PLATFORMS.

SECURITY OF YOUR INFORMATION

We use commercially reasonable security safeguards designed to help protect Personal Information from unauthorized access, alteration, loss, or disclosure. Despite these efforts, please understand that no system is perfect and we cannot guarantee that unauthorized access, theft, or loss of data will not occur. Please advise us immediately at security@kyro.us of any incident involving Personal Information in our custody or control.

CHANGES TO YOUR INFORMATION

If your Personal Information changes and you need to update it with us, you can do so by logging into your account with us (if you have one) and making any changes to the information stored there or by emailing us at privacy@kyro.us and letting us know what information in our records should be updated.

CHANGES TO THIS POLICY

We may revise this Privacy Policy from time to time, and we will review it at least once every twelve months. If we make material changes, we will notify you by email, in the mobile application, or by a notice on our website before the changes take effect. The most current version of our Privacy Policy will be posted on our website. Once posted, any changes to the Policy are effective immediately unless otherwise specifically noted. By continuing to access or use our Sites, purchase our products, or otherwise provide any information to us after any changes are posted, you agree to be bound by the terms of the revised Privacy Policy.

SEVERABILITY

The provisions of this Privacy Policy are intended to be severable. If for any reason any provision of this Privacy Policy shall be held invalid or unenforceable in whole or in part in any jurisdiction, such provision shall, as to such jurisdiction, be ineffective to the extent of such invalidity or unenforceability without in any manner affecting the validity or enforceability thereof in any other jurisdiction or the remaining provisions hereof in any jurisdiction.

CHOICE OF LAW, JURISDICTION, AND VENUE

This Privacy Policy, your use of our Sites, and your provision of Personal Information to us shall be governed by and interpreted in accordance with the applicable laws of the United States and the State of Delaware without giving effect to any choice of law or conflict of law provision or rule. By accessing or using our Sites or otherwise providing information to us, visitors from outside of the United States acknowledge that their access and/or use is subject to the laws and regulations of the United States and the State of Delaware. Nothing in this section limits any rights you have under applicable privacy laws.

Any disputes arising from this Privacy Policy or your access to or use of our Sites shall be subject to the exclusive jurisdiction of the state and federal courts located in Collin County, Texas. By accessing or using any of our Sites or by providing your Personal Information to us, you consent and submit to the personal jurisdiction of such courts for such purposes and waive any and all objections as to jurisdiction or venue in such courts.

U.S. STATE PRIVACY RIGHTS

Depending on where you live, including California, Colorado, Connecticut, Texas, Virginia, and other states with comprehensive privacy laws, you may have the rights described in this section, subject to exceptions in applicable law. California residents also have rights under California's "Shine the Light" law and the California Online Privacy Protection Act.

Right to Information. Subject to certain limits, you may ask us to provide the following information for the 12-month period preceding your request:

(1) The categories of Personal Information we collected about you;

(2) The categories of sources from which the Personal Information was collected;

(3) The business or commercial purpose for collecting the Personal Information;

(4) The categories of third parties with whom we shared the Personal Information;

(5) If we disclosed Personal Information for a business purpose, a list of the disclosures including the Personal Information categories that each category of recipient received; and

(6) The specific pieces of Personal Information we collected about you.

Right to Delete. You also have the right to ask us to delete any Personal Information that we have collected about you, subject to certain limitations as set forth under CCPA. We may deny your deletion request if the information is necessary for us or our service providers to, among other things, provide a good or service you requested, take actions reasonably anticipated in the context of our business relationship with you, perform a contract we have with you, detect and protect against security incidents or illegal activity, comply with a legal obligation, or exercise a right provided for by law.

Right to Correct. You may ask us to correct inaccurate Personal Information we maintain about you.

Right to Opt Out. You may opt out of the sale or sharing of your Personal Information and of targeted advertising, as described under "Your Privacy Choices." We do not use or disclose sensitive Personal Information for purposes that would give rise to a right to limit its use under California law, and we do not use Personal Information for profiling that produces legal or similarly significant effects.

Right to Appeal. If we decline to take action on your request, you may appeal by emailing privacy@kyro.us with the subject line "Privacy Request Appeal." We will respond to your appeal within the time required by law. If you are not satisfied, you may contact your state attorney general.

Right to Nondiscrimination. We will not discriminate against you if you exercise your privacy rights under California law, including by:

- Denying you goods or services.
- Charging you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.

- Providing you a different level or quality of goods or services.

- Suggesting that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, the CCPA permits us to offer you certain financial incentives that can result in different prices, rates, or quality levels, which are related to your Personal Information's value. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.

Submission of Requests for Information or to Delete. You may submit a privacy request by:

> Emailing us at privacy@kyro.us – please provide your name, telephone number, your state of residence, and type of request (that is, a request for categories of information, a request for specific pieces of information, and/or a request to delete).

To protect your privacy and security, we will also take reasonable steps to verify your identity before providing your Personal Information and before deleting your information. Only you or someone legally authorized to act on your behalf may make a verifiable request related to your Personal Information. If you want to authorize someone else to make a request on your behalf, please contact us at privacy@kyro.us and provide your name, telephone number, the name of the person you want to authorize to make a request, and the type of request the person is authorized to make (that is, a request for categories of information, a request for specific pieces of information, and/or a request to delete). We will contact you if we need more information.

Responses to Requests. We do not charge a fee to respond to your request unless it is repetitive (more than twice in a 12-month period) or excessive. We generally will respond to your request within 45 days of its receipt. If we need more time to respond, we will inform you of the reason and we may take up to an additional 45 days to respond.

INTERNATIONAL USERS

If you are located in Canada or Australia, you may request access to and correction of your Personal Information, and you may withdraw consent where we rely on it, by emailing privacy@kyro.us. You may also contact the Office of the Privacy Commissioner of Canada (or your provincial privacy regulator) or the Office of the Australian Information Commissioner.

CONTACT US

If you have any questions or comments about this Privacy Policy, please contact us at:

Email: privacy@kyro.us

Mail: KYRO Technologies, Inc.
9720 Coit Rd Ste 220-345
Plano, TX 75025Attn: Privacy