



## RemoFirst Privacy Policy

Last updated

May 1, 2023

Remofirst, Inc. and its affiliates (“Remofirst,” “we,” “our,” and/or “us”) values the privacy of individuals who use our websites (such as remofirst.com) or services that link to this Privacy Policy (collectively, our “Services”). If you are located in the European Economic Area (“EEA”) or the United Kingdom (“UK”), “personal information” means any information relating to an identified or identifiable individual. This privacy policy (the “Privacy Policy”) explains how we collect, use, and disclose personal information from users of our Services. By using our Services, you agree to the collection, use, and disclosure of your personal information as described in this Privacy Policy. Beyond this Privacy Policy, your use of our Services is also subject to our Terms of Use.

### INFORMATION WE COLLECT

We may collect a variety of information from or about you or your devices from various sources, as described below. If you do not provide your information when requested, you may not be able to use our Services if that information is necessary to provide you with our Services or if we are legally required to collect it.

#### A. Information You Provide to Us

**Registration for a Demo.** When you register for a demo account to use our Services, we ask you for your personal information, which may include your email address, company name, first name, and last name.

**Registration to Remofriends Referral Program.** When you register for the Remofriends Referral Program, we ask you for some personal information, which may include email address, company you are referring, name of contact you are referring, email of contact you are referring.

**Registration as a client or partner.** When you register for an account, as a client or as a partner to use our Services, we ask you for your personal information, which may include your first name, maiden name, last name, username or similar identifier, date of birth, billing address, delivery address, email address and telephone numbers.

**Registration as a candidate.** When you register for an account, as a candidate to use our Services, we ask you for your personal information, which may include your name, email address, home address, contact telephone numbers, username and passwords. It may also include work information, such as job title and other business or company information, including, but not limited to, state and country of company residence, occupation, industry and/or any

other information needed in the employment process based on your country of residence, or the country you will be employed.

**Communications.** If you contact us directly, we may receive additional personal information about you. For example, when you contact us via a contact form, email, or other means, we will receive your first name, last name, email address, as well as the content, date, and time of your message. If you subscribe to our newsletter, we will receive your name and email address. When we send you emails, we may track whether you open them to learn how to deliver a better customer experience and improve our Services.

**Payment Information.** When you make a payment to Remofirst, your credit card information, debit card information, billing information, and any other financial information necessary to complete your payment ("Payment Information") is processed by our third-party payment processors (Stripe <https://stripe.com/en>), and we do not collect, store, or process your Payment Information. For more information, please see the Payment Processing section below.

**Careers.** If you decide to apply for a job with us, you may submit your contact information and your resume online. We will collect the information you choose to provide us as part of your job application, such as your contact information, current employment information, and other information you choose to submit with your application and on your resume. If you apply for a job with us through a third-party platform LinkedIn, Lever, we will collect the information you make available to us through such third-party platform.

## B. Information We Collect When You Use Our Services

**Location Information.** When you use our Services, we may infer your general location information. For example, your IP address may indicate your general geographic region.

**Device Information.** We receive information about the device and software you use to access our Services, including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our Services.

**Usage Information.** To help us understand how you use our Services and to help us improve them, we automatically receive information about your interactions with our Services, including but not limited to [the pages or other content you view, the searches you conduct, and the dates and times of your visits].

**Analytics Partners.** We use analytics services such as Google Analytics to collect and process certain analytics data. These services may also collect information about your use of other websites, applications, and online resources. You can learn about Google's practices by going to <https://www.google.com/policies/privacy/partners/> and opt out of them by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.

If you participate in a referral program, the referral email and referral link sent to any referred leads may include your first name; if there is a sale of Remofirst (including, without limitation, a merger, stock acquisition, sale of assets or reorganization), or in the event that Remofirst liquidates or dissolves, we may sell, transfer or otherwise share some or all of our assets, which could include your information, to the acquirer; we may share de-identified personal information with academic institutions to perform research, under controls that are designed to protect your privacy — including requiring such institutions to operate under confidentiality agreements and mandating that published findings contain only de-identified and aggregated data; from time to time, we may share reports with the public that contain anonymized, aggregate, de-identified information and statistics; and we may share your information with certain other third parties with whom you, your Client, or your Client's accountant partner expressly authorize us to share your information.

**Information from Cookies and Similar Technologies.** We and our third-party partners may collect personal information using cookies, which are small files of letters and numbers that we store on your browser or the hard drive of your computer. They contain information that is transferred to your computer's hard drive. We and our third-party partners may also use pixel tags and web beacons on our Services. These are tiny graphic images placed on web pages or in our emails that allow us to determine whether you have performed a specific action. We use cookies, beacons, invisible tags, and similar technologies (collectively "Cookies") to collect information about your browsing activities and to distinguish you from other users of our Services. This aids your experience when you use our Services and allows us to improve the functionality of our Services. Cookies can be used for performance management (i.e., collecting information on how our Services are being used for analytics purposes). For more information about how we collect information via cookies and similar technologies please access Cookies Policy.

### C. Payment Processing

When you make purchases through our Services, your payment is processed by a third-party payment processor such as Stripe <https://stripe.com/en> ("Payment Processor"). This Payment Processor may collect Payment Information and other information from you, including your name, email address, and billing address. The use of your information by the Payment Processor is governed by its terms and conditions and privacy policy, and information we receive about you from our Payment Processor is governed by this Privacy Policy.

### HOW WE USE THE INFORMATION WE COLLECT

We use the information we collect:

- To provide, maintain, debug, improve, and enhance our Services;
- To understand and analyze how you use our Services, and develop new products, services, features, and functionalities;
- To understand and analyze usage patterns;

To process your job application;  
To communicate with you, provide you with updates and other information relating to our Services and its promotions, provide information that you request, respond to comments and questions, and otherwise provide customer support;  
To send you SMS, calls, or push notifications;  
To find and prevent fraud, and respond to trust and safety issues that may arise;  
To aggregate and otherwise de-identify for other business purposes;  
To facilitate transactions and payments;  
For marketing purposes, such as developing and providing promotional and advertising materials that may be useful, relevant, valuable or otherwise of interest to you;  
For compliance purposes, including enforcing our Terms of Service or other legal rights, or as may be required by applicable laws and regulations or requested by any judicial process or governmental agency; and  
For other purposes for which we provide specific notice at the time the information is collected.

#### LEGAL BASES FOR PROCESSING EUROPEAN INFORMATION

If you are located in the European Economic Area or the United Kingdom, we only process your personal information when we have a valid “legal basis,” including as set forth below.

**Consent.** We may process your personal information where you have consented to certain processing of your personal information. For example, we may process your personal information to send you marketing communications or to use Cookies where you have consented to such use.

**Contractual Necessity.** We may process your personal information where required to provide you with our Services. For example, we may need to process your personal information to respond to your inquiries or requests.

**Compliance with a Legal Obligation.** We may process your personal information where we have a legal obligation to do so. For example, we may process your personal information to comply with tax, labor and accounting obligations.

**Legitimate Interests.** We may process your personal information where we or a third party have a legitimate interest in processing your personal information. Specifically, we have a legitimate interest in using your personal information for product development and internal analytics purposes, and otherwise to improve the safety, security, and performance of our Services. We only rely on our or a third party’s legitimate interests to process your personal information when these interests are not overridden by your rights and interests.

#### HOW WE SHARE THE INFORMATION WE COLLECT

We do not share or otherwise disclose information we collect from you except as described below or otherwise disclosed to you at the time of the collection.

**Affiliates.** We may share any information we receive with our affiliates for any of the purposes described in this Privacy Policy.

**Vendors and Service Providers.** We may share any information we receive with vendors and service providers retained in connection with the provision of our Services.

**Analytics Partners.** We use analytics services such as Google Analytics to collect and process certain analytics data. These services may also collect information about your use of other websites, apps, and online resources. You can learn about Google's practices by going to <https://www.google.com/policies/privacy/partners/> and opt out of them by downloading the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout>.

**Marketing.** We do not rent, sell, or share information about you with nonaffiliated companies for their direct marketing purposes unless we have your permission.

**As Required by Law and Similar Disclosures.** We may access, preserve, and disclose your personal information if we believe doing so is required or appropriate to: (a) comply with law enforcement requests and legal process, such as a court order or subpoena; (b) respond to your requests; or (c) protect your, our, or others' rights, property, or safety.

**Merger, Sale, or Other Asset Transfers.** We may disclose and transfer your personal information to service providers, advisors, potential transactional partners, or other third parties in connection with the consideration, negotiation, or completion of a corporate transaction in which we are acquired by or merged with another company or we sell, liquidate, or transfer all or a portion of our business or assets.

**Consent.** We may also disclose personal information with your permission.

## YOUR CHOICES

**Marketing Communications.** You can unsubscribe from our promotional emails via the link provided in the emails. It may take up to ten business days for us to process your request. Even if you opt out of receiving promotional messages from us, you will continue to receive administrative messages from us.

**Your European Privacy Rights.** If you are located in the EEA or the UK, you have additional rights described below.

You may request access to the personal information we maintain about you, update and correct inaccuracies in your personal information, restrict or object to the processing of your personal information, have your personal information anonymized or deleted, as appropriate, or exercise your right to data portability to easily transfer your personal information to another company. In addition, you have the right to lodge a complaint with a supervisory authority, including in your country of residence, place of work or where an incident took place.

You may withdraw any consent you previously provided to us regarding the processing of your personal information at any time and free of charge. We will apply your preferences going forward and this will not affect the lawfulness of the processing before you withdrew your consent.

You may exercise these rights by contacting us using the contact details at the end of this Privacy Policy. Before fulfilling your request, we may ask you to provide reasonable information to verify your identity. Please note that there are exceptions and limitations to each of these rights, and that while any changes you make will be reflected in active user databases instantly or within a reasonable period of time, we may retain personal information for backups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal obligations, or where we otherwise reasonably believe that we have a legitimate reason to do so.

**How to Block Cookies.** You can block Cookies by setting your internet browser to block some or all Cookies. However, if you use your browser settings to block all Cookies (including essential Cookies) you may not be able to access all or parts of our Services. By using our Services, you consent to our use of Cookies and our processing of personal information collected through such Cookies, in accordance with this Privacy Policy. You can withdraw your consent at any time by deleting placed Cookies and disabling Cookies in your browser, or as explained below. You can change your browser settings to block or notify you when you receive a Cookie, delete Cookies or browse our Services using your browser's anonymous usage setting. Please refer to your browser instructions or help screen to learn more about how to adjust or modify your browser settings. If you do not agree to our use of Cookies or similar technologies which store information on your device, you should change your browser settings accordingly. You should understand that some features of our Services may not function properly if you do not accept Cookies or these technologies. Where required by applicable law, you will be asked to consent to certain Cookies and similar technologies before we use or install them on your computer or other device.

### THIRD PARTIES

Our Services may contain links to other websites, products, or services that we do not own or operate ("Third-Party Services"). We are not responsible for the privacy practices of these Third-Party Services. Please be aware that this Privacy Policy does not apply to your activities on these Third-Party Services or any information you disclose to these Third-Party Services. We encourage you to read the privacy policies of these Third-Party Services.

### RETENTION

We take measures to delete your personal information or keep it in a form that does not permit identifying you when this information is no longer necessary for the purposes for which we process it, unless we are required by law to keep this information for a longer period. When we process personal information for our own purposes, we determine the retention period taking into account various criteria, such as the type of services provided to you, the nature and length of our relationship with you, possible re-enrollment with our Services, the impact on our Services we provide to you if we delete some information from or about you, and mandatory retention periods provided by law and the statute of limitations.

### SECURITY

We make reasonable efforts to protect your personal information by using physical and electronic safeguards designed to improve the security of the personal information we maintain.

However, as no electronic transmission or storage of information can be entirely secure, we can make no guarantees as to the security or privacy of your personal information.

We shall be responsible for establishing and maintaining an information security program that is designed to:

- protect the security and confidentiality of personal data;
- protect against anticipated threats or hazards to the security or integrity of the personal data;
- protect against unauthorized access to or use of the personal data;
- ensure the proper disposal of personal data, as further defined herein;
- ensure that all employees and subcontractors, if any, comply with all of the foregoing.

We shall conduct formal privacy and security awareness training for all personnel and required contractors as soon as reasonably practicable after the time of hiring and/or prior to being appointed to work on personal data and annually recertified thereafter.

We shall maintain authorization and authentication technologies and processes to ensure that only authorized persons access personal data, including:

- granting access rights on the basis of the need-to-know-principle;
- reviewing and maintaining records of employees who have been authorized or who can grant, alter or cancel authorized access to systems;
- requiring personalized, individual access accounts to use passwords;
- encrypting, logging and auditing all access sessions to systems containing personal data.

We shall engage, at least one time per year, a third-party vendor to perform penetration and vulnerability testing with respect to Our systems containing and/or storing personal data. The objective of such penetration testing shall be to identify design and/or functionality issues in Our infrastructure or systems containing and/or storing personal data, which could expose to risks from malicious activities.

## INTERNATIONAL VISITORS

Our Services are hosted in the United States ("U.S.") and intended for visitors located within the U.S. If you choose to use our Services from the EEA, the UK or other regions of the world with laws governing data collection and use that may differ from U.S. law, then please note that you are transferring your personal information outside of those regions to the U.S. for storage and processing. We may transfer information from the EEA or the UK to the U.S. and other third countries based on European Commission-approved or UK Government-approved Standard Contractual Clauses, or otherwise in accordance with applicable data protection laws. Also, we may transfer your data from the U.S. to other countries or regions in connection with storage and processing of data, fulfilling your requests, and operating our Services. By providing any information, including personal information, on or to our Services, you consent to such transfer, storage, and processing.

## CHILDREN'S PRIVACY

We do not knowingly collect, maintain, or use personal information from children under 16 years of age, and no parts of our Services are directed to children. If you learn that a child has provided us with personal information in violation of this Privacy Policy, please alert us at [help@remofirst.com](mailto:help@remofirst.com).

#### CHANGES TO THIS PRIVACY POLICY

We will post any adjustments to the Privacy Policy on this page, and the revised version will be effective when it is posted. If we materially change the ways in which we use or share personal information previously collected from you through our Services, we will attempt to notify you through our Services, by email, or by other means.

#### CONTACT INFORMATION

If you have any questions, comments, or concerns about our processing activities, please email us at [dpo@remofirst.com](mailto:dpo@remofirst.com) or write to us at:

Remofirst Inc.  
415 Mission St  
San Francisco, CA 94105  
United States