

## SCALED COGNITION PRIVACY POLICY

**Effective Date:** December 18, 2024

Welcome to the Scaled Cognition website (the “Site”) provided by Scaled Cognition, Inc. (“Scaled Cognition” or “we” or “our” or “us”). This Privacy Policy (the “Privacy Policy”) describes the types of information we collect or that you provide to us through the Site or other means, including without limitation, through applications, services or other online communications (collectively, the “Services”) with us, how we may use that information, to whom and under what circumstances we may disclose it, and how we protect it. We value your privacy and the privacy of the information you share with the Services. By using this Services, interacting with us thorough digital and non-digital channels, or otherwise voluntarily providing personal information to us, you consent to the terms of this Privacy Policy. If you do not agree to the policy, you may not use the Services.

### ***1. Collection of Personal Information and Other User Materials***

#### Information You Give to Us

We may collect information you provide when you interact with us (“User Materials”), such as your first and last name, email address, billing and shipping address, phone number, payment information, purchase history, location data, and user content, including any personal information contained in your input to the Services. Some examples are when you:

- ☐ Register or create an account on the Site;
- ☐ Sign up to receive email communications from us;
- ☐ Correspond or communicate with us by phone, e-mail, chat, or otherwise;
- ☐ Use our Services to purchase products, tools or other services;
- ☐ Use our Services to interact with us, or other users; or
- ☐ Participate in one of our surveys or promotions.

#### Information Collected Automatically

Each time you access any of the Services, we may automatically collect certain types of information. Some examples of automatic information we may collect are as follows:

- ☐ Your IP address, MAC address, browser type, operating system, device-identifying information, type of computer, and type of Web browser software, the specific webpages visited during your connection, and the domain name from which you accessed the Services.
- ☐ Information about your browsing behavior, such as the date and time you visit the Services, the areas or pages of the Services that you visit, the amount of time you spend viewing and using the Services, the number of times you return to or access the Services and other clickstream data.
- ☐ We may use “cookies” of different types to recognize your computer. A cookie is a small text file that a website, online application, or e-mail may save to your internet browser and/or your computer’s hard drive for use in subsequent visits to the Services or other sites.

We may use web beacons, match scripts, pixel tags or similar technologies that allow us to know if a particular web page was visited, an e-mail opened, or links in the email utilized. In some instances, these technologies may allow us to match activities with particular users.

We may combine the information we collect through cookies, web beacons, or other technology tools with other information we have collected from you or information from other sources. See Section 4 (Cookies Policy) below for more information.

## ***2. Use of Personal Data and User Materials***

We may use information about you and User Materials for purposes described in this Privacy Policy or disclosed to you on through the Services. For example, we may use information about you:

- ☐ To provided the Services
- ☐ For editorial and feedback purposes;
- ☐ For marketing, advertising, and promotional purposes;
- ☐ To develop and improve new and existing technology, products, and services, including to train models;
- ☐ For content improvement and research;
- ☐ To customize the content and layout of the Services;
- ☐ To notify you about updates to the Services or research;
- ☐ To comply with legal obligations;
- ☐ To respond to your inquiries; or
- ☐ To take other actions in response to your inquiries or other website and service use activities.

We also may aggregate personal information and use such information to analyze the effectiveness of our Services, improve our Services, conduct research and for other related purposes.

## ***3. Sharing or Disclosure of Your Personal Data***

Except as otherwise set forth in this Privacy Policy, or otherwise agreed by you, we will not sell or disclose to third parties any individually identifying information, such as names, email addresses, payment information, and other personal information which users voluntarily provide to us, except as follows:

- ☐ We work with business partners who support us. We also use outside service providers to facilitate the Services and overall operation, and to perform functions on our behalf, such as monitoring visitors to our Services, sending emails and promotional offers, analyzing data, storing data, processing payments, controlling access to the Services, and providing customer service. These third-party service providers are prohibited from using personal information for any other purpose other than those necessary to perform the services or part thereof which they have been engaged for and, in each case in accordance with applicable laws and requirements, which may include Payment Card Industry Data Security Standards if they are processing payments.
- ☐ To the extent necessary to comply with applicable laws or valid legal processes, such as in response to subpoenas or court orders.
- ☐ To protect the rights and intellectual property of Scaled Cognition or its third party providers and licensors.

- ☐ To investigate, prevent or take action regarding illegal activities, suspected fraud, violations of our policies, or as otherwise required by law.
- ☐ In connection with any type of corporate transactions, including reorganization, change of control, sale of assets or merger activities, your personal information may be disclosed during the diligence process with counterparties and others as part of such transaction and may be transferred to a successor or affiliate as part of that transaction;
- ☐ In urgent circumstances to protect Scaled Cognition or the personal safety of any individual.

#### **4. *Payment Processing***

We use a third-party payment processor to process online payments. Our current payment processor is [Stripe (<https://stripe.com/>)] (our “Payment Processor”). By placing an order with us, you authorize us to share your personal information with our Payment Processor. We do not store, maintain, or otherwise process your complete payment information. Information regarding our Payment Processor’s privacy and data security policies and procedures can be found by visiting: [<https://stripe.com/privacy>]. We reserve the right to change our Payment Processor at any time.

#### **5. *Cookies Policy***

The Services use “cookies,” which are small pieces of information stored by your browser or other application on your computer's browser or hard drive. The cookies are used to connect your computer with information stored about your online activity, searches and preferences both within the same website visit and from one visit to the next on the Services. Some examples of this data include your account preferences, user specific information on pages accessed, searched terms or addresses entered, and previous visits to the sites. We use both session ID cookies and persistent cookies. A session cookie expires when your browser is closed, and a persistent cookie may stay on your hard drive for an extended period. Session cookies make it easier for you to navigate our site; persistent cookies can perform such activities as storing your password for forums or blogs so you do not have to sign in every time you visit those areas, and/or may be used to enable us to track and target the interests of our users so as to enhance the overall experience of using the Services.

The “help” portion of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive new cookies or how to disable cookies altogether. If you reject cookies, you may not be able to participate in certain activities or receive a promotion tailored to you. The Services do not control and do not guarantee the effectiveness of browser-based tools for managing cookies.

We may also use Google Analytics to monitor activity on the Site. To learn how Google Analytics collects and processes data, please visit: “How Google uses data when you use our partners’ sites or apps” located at [www.google.com/policies/privacy/partners](http://www.google.com/policies/privacy/partners)

We may also use web beacons, which are electronic images that may be used on our websites or in our emails. We use web beacons to deliver cookies, count visits, understand usage and campaign effectiveness and to tell if an email has been opened and acted upon.

#### **6. *Links to Other Websites***

The Services may contain links to other sites or third party providers that are not controlled in any way by us. Please be aware of this when you click on any such links; we are not responsible for the privacy practices and/or policies of any website other than our own. Consequently, we strongly suggest that you review the privacy policy and terms and conditions of every website you visit, whether or not they are linked to by our own site.

## **7. Data Security and Retention**

We use industry-standard techniques on design to help to protect any personal information you have provided to us from loss, misuse or alteration. However, please be aware that no method of electronic storage or protection can ever be 100% secure. Therefore, as is the case with any organization - we are not in a position to guarantee the absolute security of your information. In this regard, we urge you to take every precaution to protect your personal data while you are on the Internet. At a minimum, we encourage you to make sure that you are using a secure browser as you surf the Internet.

## **8. Children's Privacy**

### Under Age 13

Our Services are not specifically directed toward children, and we do not knowingly collect personal information from persons under the age of 13 through the Services without verifiable parental consent. If we learn that a child under the age of 13 has submitted personally identifiable information online without parental consent, we will take all reasonable measures to delete such information from our databases and to not use such information for any purpose (except where necessary to protect the safety of the child or others as required or allowed by law). If you become aware of any personally identifiable information we have collected from children under 13, please contact us at [privacy@scaledcognition.com](mailto:privacy@scaledcognition.com).

### Under Age 18

Minors under 18 years of age may have the Personal Information that they provide to us through the Services deleted by sending an email to [privacy@scaledcognition.com](mailto:privacy@scaledcognition.com) requesting deletion. Please note that, while we make reasonable efforts to comply with such requests, deletion of your personal information does not ensure complete and comprehensive removal of that data from all systems.

## **10. Do Not Track**

Do Not Track ("DNT") is a privacy preference that users can set in some web browsers, allowing users to opt out of tracking by websites and online services. At the present time, the World Wide Web Consortium (W3C) has not yet established universal standards for recognizable DNT signals and therefore, Scaled Cognition and the Services do not recognize DNT.

## **11. Your California Privacy Rights**

California residents who provide personal information in obtaining products or services for personal, family, or household use are entitled to request and obtain from us once a calendar year information about the customer information we shared with third parties for their own direct marketing purposes, including the categories of information and the names and addresses of those businesses with which we have shared such information. As discussed elsewhere in this Privacy Policy, we do not currently share

the personal information of California residents with third parties for their own direct marketing purposes. However, if you have further questions about our privacy practices and compliance with California law, please contact us as explained below.

## **12. *Changes to Privacy Policy***

We may change this Privacy Policy from time to time, including as required to keep current with applicable law, rules and regulations, new technologies, and security standards. When we do, we will post the change(s) on our website or through the Services. If we change the policy in a material and retroactive manner, we will provide appropriate notice to you.

## **13. *Contact Details***

If you have any questions or concerns regarding this privacy policy, or you wish to contact us by phone or postal mail, our contact information is as follows:

Email: [privacy@scaledcognition.com](mailto:privacy@scaledcognition.com)