

Jayaram.xyz Privacy Policy

Effective January 21, 2025

ACCEPTANCE. We are Creative Accelerator LLC, a limited liability company organized and existing under the laws of New York, doing business as Jayaram.xyz, (“Accelerator”). By accessing or using the Accelerator website, www.jayaram.xyz (the “Site”) or any Accelerator applications or application plug-ins (each an “App”) or requesting or receiving Services (defined below), you acknowledge and agree to our use of your information consistent with this privacy policy (“Privacy Policy”) and that you are bound by this Privacy Policy, which is hereby incorporated by reference into Accelerator’s terms of service (together with all addendums, exhibits, attachments, supplements and other terms and policies incorporated therein by reference, “Terms of Service”). You understand that this Privacy Policy affects your legal rights and obligations regarding the Site, Apps and Services (as defined below). If you do not agree with this Privacy Policy, you must refrain from using our Sites, Apps and/or Services.

In this Privacy Policy, the words “you” and “your” refer to each customer, Site visitor, App user or Service recipient (which customer, visitor, user or recipient may be an individual, organization or company); “we”, “us” and “our” refer to Accelerator; “Services” refers to all services provided by us. In this Privacy Policy, we may use the terms visitor, customer and user interchangeably.

WHAT THIS POLICY IS. Accelerator takes your privacy seriously and is mindful of potential concerns about how we use the Personal Information we collect from and about you. This Privacy Policy describes Accelerator’s approach to privacy and provides information about how Accelerator collects, uses, processes, and discloses Personal Information (as defined below).

If you have questions about this Privacy Policy you may contact contact@jayaram.xyz.

Minors under the age of 18 may not use the Site or the Apps or receive the Services. We do not knowingly collect information from children under 18 years of age. If you become aware your child or any child under your care has provided us information without your consent, please contact us at contact@jayaram.xyz. If we learn that we have collected Personal Information from a child under age 18, we will promptly delete their Personal Information.

WHAT THIS POLICY COVERS. This Privacy Policy describes how Accelerator collects, uses and discloses your Personal Information when acting as a data controller. Activities

that are not covered by this Privacy Policy include, without limitation, the processing of Personal Information that may be collected or used by other businesses when you click on third-party links found on the Site, in Apps or in connection with the Services, or use social media widgets that we provide, or the processing of Personal Information on your behalf in our capacity as a data processor providing Services to you. Our processing of Personal Information on your behalf in our capacity as a data processor is governed by our Terms of Service with you (excluding the terms of this Privacy Policy, as indicated above). Please be aware that if you access any third-party links, you will be leaving our Site, Apps or Services. We encourage users to read the privacy policy of third-party websites and services for information about their privacy practices, as we are not responsible for their content, links, or privacy procedures.

PERSONAL INFORMATION WE COLLECT. We may collect information that personally identifies, relates to, describes, or is capable of being associated with you (“Personal Information”). In this section of the Privacy Policy, we explain the types of Personal Information we may collect. The specific information that we may collect about you depends on the type of interaction and the types of products or services considered or purchased. Accelerator potentially collects the following categories of Personal Information:

- **IDENTIFIERS:** Examples of the types of identifiers that Accelerator may collect include real names, nicknames, signatures, postal addresses, online identifiers, Internet Protocol addresses, email addresses, phone numbers, government identifiers, usernames and passwords, and account numbers and login information.
- **COMMERCIAL INFORMATION:** Examples of the types of commercial information that Accelerator may collect includes records of business and other property owned, products or services purchased, obtained, or considered from Accelerator or our partners, other purchasing or consuming histories or tendencies, and payment information associated with purchases which may include credit/debit card or bank account numbers.
- **INTERNET AND OTHER ELECTRONIC NETWORK INFORMATION:** Examples of the types of internet activity information that Accelerator may collect includes browsing history, search history, information about the device used to access our website or applications, information regarding your interaction with websites, applications, or advertisements and other information collected by cookies and similar technologies including information about your device. We may also collect information from visitors to our website, such as browser settings, operating systems, referring/exit pages, and clickstream data. When we send you an email,

Accelerator may also collect information, including about how you interact with that email.

- **AUDIO AND VISUAL INFORMATION:** Accelerator may make audio recordings of telephone calls. We may make visual recordings if you agree that we may videotape or photograph you. We may also collect visual images of you in connection with legal requirements, security purposes, or when required for providing certain products.
- **COMMUNICATION RECORDINGS:** Accelerator may record calls and retain the content of written and electronic communications between you and us. By communicating with us, you consent to our recording and retention of communications.
- **PROFESSIONAL AND EMPLOYMENT-RELATED INFORMATION:** Examples of the types of professional and employment-related information Accelerator may collect includes information about professional status and affiliations, employment history, employer, salary, title, and employment status.
- **INFERENCES.** Examples include information inferred about customer preferences, characteristics, predispositions, behaviors, and attitudes.
- **OTHER TYPES OF INFORMATION:** We may also collect information provided to Accelerator directly by you, such as when you complete a questionnaire, upload a document, answer a survey, or receive a consultation.

COLLECTION OF ANONYMOUS INFORMATION. We use technology to passively collect and store certain information that is not tied to a specific identified user. This information is sufficiently de-identified according to the standards of applicable laws and will not be associated with an identifiable individual. We will not attempt to re-identify the user associated with de-identified information. We may use and disclose de-identified information for any purpose permitted under applicable laws.

HOW WE COLLECT PERSONAL INFORMATION. This is how and where we collect Personal Information:

- **CUSTOMERS:** Much of the Personal Information that Accelerator collects comes directly or indirectly from our customers and prospective customers. Information that is collected directly from you is information that you provide when you interact with the Site, an App or the Services, for example, to complete a field, upload a document, use a communication feature, or speak to us on the phone or via email. We may also collect information indirectly about you when you interact with our

Site, an App, or the Services using cookies and other tracking technologies. You are not required to provide us your Personal Information; however, if you choose not to provide the requested information, you may not be able to use some or all of the features of our Site, Apps or Services or we may not be able to fulfill your requested interaction.

- **RELATED PARTIES:** We may collect information about you from someone you know. For instance, we may receive information about you from customers using our products and services to send communications to you or someone providing services to you through or using our products and services.
- **SERVICE PROVIDERS:** We may collect information about you from our Service Providers, like a cloud-computing service provider, or other companies that we work with to deliver products or services to you. As used in this Privacy Policy, “Service Providers” means entities that Accelerator has contracted with to provide us with services to help fulfill our business needs. Service Providers may also assist us in collecting information both directly and indirectly from you.
- **PROFESSIONALS:** We may receive information about you from the attorneys you work with through our Site, Apps and Services. Accelerator does not intend to collect any information from attorneys where the collection would result in a waiver of the attorney-client privilege. Information you provide as part of a Legal Service (as defined in the Terms of Legal Service you may accept as part of using our tools) shall be between you and your attorney.
- **BUSINESS PARTNERS:** We may receive information about you from our Business Partners. As used in this Privacy Policy, “Business Partners” means entities that Accelerator has contracted with to engage in cross-promotional or product integration activities. An example of the type of information that we may receive from our business partners is information about the products you purchased from them.
- **AFFILIATES AND SUBSIDIARIES:** We may receive information about you from our affiliates and subsidiaries. For example, if we acquire an ownership interest in a company, we may receive information about you as part of that acquisition if you have previously done business with them.
- **PUBLICLY/COMMERCIALY AVAILABLE INFORMATION:** We may collect information about you from publicly available sources of information, including government records, social media sites, and other commercially available sources of Personal Information. Examples of the type of information we may collect from publicly available sources are the status of your trademark applications or registrations and other information regarding such applications or registrations or

whether you have recently expressed interest in purchasing a product or service that Accelerator sells.

- **UNRELATED PARTIES:** We may receive information related to you from people and entities with whom Accelerator does not have a direct relationship.

HOW WE USE YOUR PERSONAL INFORMATION. We have commercial and business purposes for collecting your Personal Information. Accelerator may use the information that it collects for the purposes listed below. We may use technology, including automated processing, robotics, artificial intelligence (“AI”) and statistical modeling, and human review to accomplish these purposes. We may also combine information that we have collected from multiple sources. If we decide to use the Personal Information we have collected for additional purposes that are inconsistent with what is described below, we will let you know of our plans and give you information about your legal rights regarding your Personal Information.

- **PROVIDING PRODUCTS AND SERVICES:** We may use Personal Information to provide and support our products and services. Examples of these uses include producing and delivering analyses and reports purchased by customers, administering the Site, Apps and Services, and displaying content based on customer preferences.
- **SECURITY:** We may use Personal Information to ensure we maintain appropriate security over computer networks and our physical facilities, as well as detecting fraud or other suspicious activities.
- **MARKETING AND ADVERTISING:** We may use Personal Information for marketing to current and prospective customers.
- **PRODUCT DEVELOPMENT:** We may use Personal Information for product development, including improving our existing offerings and developing new products and services, including machine learning or AI technologies.
- **ANALYTICS:** We may use Personal Information for various types of analytics. For example, Accelerator may use Personal Information to analyze how visitors arrive at and interact with our website, gain insight into the types of customers that may be interested in our products and services, and evaluate our marketing and advertising efforts. We may also use the information to develop inferences from the information we collect regarding customer preferences, characteristics, predispositions, behaviors, and attitudes.
- **OPERATIONAL PURPOSES:** We may use Personal Information for operational purposes, and the operational purposes of our Service Providers, Business

Partners, affiliates, and subsidiaries. For instance, Accelerator may use the information to maintain the Site, Apps, Services and other infrastructure, training, quality assurance, for conducting surveys or sweepstakes, to promote our brand, and to use in connection with our relationships with Service Providers and Business Partners.

- **FINANCIAL REPORTING:** We may use Personal Information in connection with various types of financial reporting and other similar internal uses. Examples of the types of financial reporting that Accelerator may use Personal Information in connection with include internal budgets and projections, compensation calculations, and public reporting.
- **MEETING LEGAL REQUIREMENTS:** We may use Personal Information to meet our legal obligations or reduce legal risk, such as performing customer due diligence or responding to subpoenas for information.
- **BUSINESS TRANSFERS:** If Accelerator undertakes or is involved in any merger, acquisition, reorganization, sale of assets, bankruptcy, or insolvency event, then we may sell, transfer, or share some or all of our assets, including information related to customers in connection with the transaction or in contemplation of the transaction (such as conducting due diligence). If such an event occurs, your information may be treated like any other Accelerator asset and sold, transferred, or shared with third parties, or used in ways not contemplated or permitted under this Privacy Policy. In this case, you will be notified via email and/or a prominent notice on our Site, Apps or Services of any change in ownership or uses of your Personal Information, as well as any choices you may have regarding your Personal Information.

HOW WE DISCLOSE PERSONAL INFORMATION. We disclose Personal Information under only certain circumstances. They are as follows:

- **SERVICE PROVIDERS:** We may share Personal Information with our Service Providers who assist us with running our business. These companies are not authorized to use the information we share with them for any purpose other than providing services to Accelerator or to you.
- **BUSINESSES PROVIDING SERVICES:** Accelerator may disclose Personal Information with other businesses who are not our service providers in order to provide you with products and services that you have purchased from Accelerator. Personal Information disclosed to such other businesses will be subject to those third parties' privacy practices. For instance, we may use FedEx, the United States Postal Service, or other shipping providers to deliver physical products you have

purchased. Similarly, we may use Stripe for purposes of processing payments or providing identity verification services. In doing so, these companies may collect and process Personal Information for their own uses, including improving their services and for fraud detection and prevention.

- **LAWYERS:** We may share Personal Information with attorneys whose services can be accessed through or using our products and services.
- **BUSINESS PARTNERS:** Accelerator may share Personal Information with Business Partners. When we share Personal Information with Business Partners, the processing of such Personal Information will generally be subject to their privacy policy. We share information with Business Partners in the following circumstances: (a) if you express interest in an offer presented to you either by Accelerator on behalf of a Business Partner or by a Business Partner on behalf of Accelerator, you are directing Accelerator to provide information about you to that Business Partner; and (b) if you purchase an Accelerator product that is bundled with a product offered by one of our Business Partners, we will share information about you with that Business Partner in connection with that purchase.
- **PARTIES RELATED TO YOU:** We may provide Personal Information about you to someone you know or that you have connected with through our platform. For instance, we may provide information connected to your Accelerator account with your authorized contacts. We may provide information about you to a customer requesting that you sign a document, such as whether you have completed the signature process.
- **GOVERNMENT ENTITIES:** Accelerator may share Personal Information about customers with government entities to fulfill the products and services purchased by our customers. Certain Personal Information becomes public record when documents are filed with the federal or a state government, or with a court. For example, a corporation's name, business address, and registered agent name becomes public information when its articles of incorporation are filed. A Secretary of State may publish this information to its website or provide this information to third parties. The U.S. Patent and Trademark Office publishes information, including the names and addresses of trademark registrants. This Privacy Policy does not cover these or similar third-party actions.
- **PUBLIC DISCLOSURES:** Accelerator may publicly disclose Personal Information in limited circumstances. We may share information publicly when it is necessary to fulfill a product that has been purchased by a customer. For example, in some states, fictitious business names, including the name and address of the business owner, must be published in a newspaper. We may display testimonials and reviews received through email surveys on our website or other marketing or that

are posted to publicly available websites. When you post content in any forum or comment area on the Site, in an App, or in connection with the Services, these posts may be publicly available. You should use caution when deciding whether to disclose your Personal Information in public areas of the Site or an App or in connection with the Services. When we collect publicly available information, we may share that information on the Site, an App or in connection with the Services.

- **REGISTERED AGENT REQUESTS:** If you designate a person or company other than Accelerator to serve as the registered agent for your business entity, Accelerator may provide your name and contact information to that party, if the designee requests.
- **REQUIRED BY LAW:** Accelerator may disclose Personal Information as required by law, such as in response to a subpoena or a lawful request by a public authority, including to meet national security or law enforcement requirements, or similar legal processes. We may also disclose Personal Information when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a legitimate request from a government entity.
- **PARTIES RELATED TO ACCELERATOR:** Accelerator may disclose Personal Information with businesses controlling, controlled by, or under common control with Accelerator. If Accelerator is merged, acquired, or sold, or if some or all of our assets or equity are transferred, we may disclose or transfer consumer data in connection with the associated transactions as contemplated above.

HOW LONG WE RETAIN YOUR PERSONAL INFORMATION. Accelerator retains your Personal Information for at least as long as it is necessary to fulfill the purposes for which we collected the data, to provide you with services and products, to comply with our data retention obligations, and to perform our obligations under law or contract. Our data retention periods are informed by business needs, legal obligations, and best practices.

ACCELERATOR'S USE OF COOKIES AND SIMILAR TECHNOLOGY, AND YOUR CHOICES. Like all online companies, Accelerator uses a range of technologies in connection with your use of the Site, Apps and Services, which may include mobile applications, and when you engage with emails, SMS and other communications that we send you. The types of technologies that we may use include cookies, web beacons, tags, scripts, local shared objects such as HTML5, advertising identifiers (including mobile identifiers such as Apple's Identifier for Advertisers ("IDFA") or Google's Advertising ID ("GAID")), and similar technologies, which for purposes of this Privacy Policy we refer to as "Cookies."

We may use Cookies for a variety of purposes. Depending on the purpose, you have (or will have) different options regarding whether and how we use Cookies to collect your Personal Information.

- **Strictly Necessary Cookies:** We use Cookies to help our Site, Apps and Services operate and for security purposes. Due to the nature of these Cookies, you do not have the ability to opt-out of the use of these Cookies.
- **Performance and Functionality Cookies:** We may use Cookies to provide enhanced functionality on our Site, Apps, and Services to personalize your experience, to collect information for analytical purposes to help us improve and develop products, and to help us understand how you are engaging with our products.
- **Engagement and Marketing Cookies:** Accelerator may use Cookies to help us understand how you engage with our marketing and to help provide you with relevant marketing about our products when you visit other websites, including through targeted advertising.

If you do not wish for Accelerator to use Performance and Functionality or Engagement and Marketing Cookies when you visit our website, now or in the future, you may (or will be able to) opt-out through our Preference Center.

One tool we use is Google Analytics. For more information about Google Analytics, including how it collects and processes Personal Information, please review Google's [Safeguarding Your Data](#) disclosure.

OPTING OUT OF PROMOTIONAL EMAILS. You can opt-out of promotional emails by using the "Unsubscribe" link and following the unsubscribe instructions in an email you receive from us or by emailing us at contact@jayaram.xyz. We may also send service-related or transactional communications, which are not promotional.

CONSENT FOR COMMUNICATION RETENTION. We may record calls and retain the content of text messages and other written and electronic communications between you and us. By communicating with us, you consent to our recording and retention of your communications.

STORAGE OF YOUR INFORMATION. Your information that we collect may be processed and stored outside of your jurisdiction where laws regarding processing of Personal Information may be less stringent than the laws in your country or state. We or our service providers have put in place safeguards to provide reasonable security for the storage and transfer of Personal Information, including encryption protocol in accordance

with applicable legal requirements. Further, when your credit or debit card account information is being transmitted through the Site, an App, or Services, it will be protected by security protocols. Accelerator uses a third-party payment processing service and does not itself store your credit card or debit card account information, and we do not have direct control over or responsibility for your credit or debit card account information. We may have the ability to process your credit card or debit card through third-party payment processing services in the event you decide to order more services from Accelerator. We do not otherwise store or process your credit or debit card information ourselves.

SECURITY AND IDENTITY VERIFICATION. Accelerator is committed to protecting the Personal Information that we collect and ensuring our products and services are provided in a secure manner. We or our hosting partners have implemented reasonable security measures designed to protect the Personal Information that we maintain. This includes implementing reasonable physical, technical, and administrative safeguards to promote the security of the information we collect. Regardless of the measures and efforts that Accelerator takes to protect Personal Information, we cannot guarantee absolute protection and security of your Personal Information. For instance, when we transmit documents to you via mail delivery services or electronically, there remains the possibility that this information may be misdirected, misdelivered, or intercepted.

We encourage you to take precautions in protecting the information that you share with Accelerator. For example, we encourage you to set strong passwords on your account and avoid sharing your password with anyone. If you believe that you have discovered a security vulnerability in the Site, an App, or the Services you may let us know at contact@jayaram.xyz. If you believe that someone has accessed your Personal Information or that your Personal Information has been misused, please let us know immediately by email to contact@jayaram.xyz.

DO NOT TRACK. Do Not Track is a web browser privacy preference that causes the web browser to broadcast a signal to websites requesting that a user's activity not be tracked. Currently, our Site does not respond to Do Not Track signals.

CALIFORNIA SHINE THE LIGHT – YOUR PRIVACY RIGHTS. We do not disclose Personal Information to third parties for those third parties to use for their own direct marketing purposes.

REVISIONS. This Privacy Policy is subject to changes from time to time in our sole discretion and without advance notice to you. We will post any such changes to the Site, Apps or Services and may otherwise post other alerts on the Site, in Apps or in connection

with the Services, or communicate such changes through email or otherwise. If you disagree with any such changes, please cease using the Site, App or Services you are using. Continued use following the posting of any such changes indicates your acceptance of the changes. If we make any changes to this Privacy Policy that materially impact previously collected Personal Information about you, we will make reasonable efforts to provide notice and obtain consent, where required by applicable law, to any such changes.