

Zowie Privacy Policy

Last Updated: 1st January 2025

Zowie, Inc. (“Zowie”) provides a self-learning AI chatbot to allow our customers to automate customer service across channels. This Privacy Policy is designed to help you understand how we collect, use, and share your personal information and to help you understand and exercise your privacy rights.

Our company participates in the EU-U.S. Data Protection Framework (DPF), the Swiss-U.S. DPF, and the UK Extension to the EU-U.S. DPF. We adhere to the DPF Principles concerning the transfer of personal data from the European Economic Area (EEA), Switzerland, and UK to the United States under the DPF.

In case of any conflicts between the terms in this privacy statement and the DPF Principles, the DPF Principles take precedence. To learn more about the DPF program, as well as view our certification, please visit <https://www.dataprivacyframework.gov/>.

1. SCOPE

This Privacy Policy applies to personal information processed by us, including on our websites, through our platform, as well as other online or offline offerings. To make this Privacy Policy easier to read, our websites, mobile applications, and other offerings are collectively called “Services”.

This Privacy Policy does not apply to any of the personal information that our customers may collect and process using Zowie’s Services. Our customers’ respective privacy policies govern their collection and use of customer data. Our processing of customer data is governed by the contracts that we have in place with our customers, not this Privacy Policy. Any questions or requests relating to Customer Data should be directed to our customer.

2. PERSONAL INFORMATION WE COLLECT

The categories of personal information we collect depend on how you interact with us, our Services, and the requirements of applicable law. We collect information that you provide to us, information we obtain automatically when you use our Services, and information from other sources such as third-party services and organizations, as described below.

Information You Provide to Us Directly

We may collect the following personal information that you provide to us.

1. **Company Account Creation.** We may collect information when you create a company account, such as name, email address, phone number, role and/or job title, and company mailing address.
2. **User Account Creation.** When you sign up for a user account with your organization, we may collect your name and company email address.
3. **Chat Service.** We may collect historical chat information if you sign up for a trial of the Zowie Services. The historical chat information that you provide may contain personal information, however we use pseudonymization tools designed to filter out any personal information included in the historical chats. We use this information to provide insights to potential customers that sign up for a trial of the Zowie Services in order to describe the business impact that our Services will deliver if the customer decides to utilize the Services on their support platform.
4. **Purchases.** We may collect personal information and details associated with your purchases, including payment information. Payments made for our Services are processed by third-party payment processors. We do not directly collect or store any payment card information entered through our Services, but we may receive information associated with your payment card information (e.g., your billing details).
5. **Your Communications with Zowie.** We may collect personal information, such as email address, phone number, company name, or mailing address when you request information about our Services, register for our newsletter, request a demo, sign up for a trial of the Services, request customer or technical support, or otherwise communicate with us.
6. **Business Development and Strategic Partnerships.** We may collect personal information from individuals and third parties to assess and pursue potential business opportunities.

Information Collected Automatically

We may collect personal information automatically when you use our Services:

1. **Automatic Data Collection.** We may collect certain information automatically when you use our Services, such as your Internet protocol (IP) address, user settings, MAC address, cookie identifiers, mobile carrier, mobile advertising and other unique identifiers, browser or device information, location information (including approximate location derived from IP address), and Internet service provider. We may also automatically collect information regarding your use of our Services, such as pages that you visit before, during and after using our Services, information about the links you click, the types of content you interact with, the frequency and duration of your activities, and other information about how you use our Services.
2. **Cookies and Other Technologies.** We, as well as third parties that provide content, advertising, or other functionality on our Services, may use cookies, pixel tags, local storage, and other technologies (“Technologies”) to automatically collect information through your use of our Services.

Cookies. Cookies are small text files placed in device browsers that store preferences and facilitate and enhance your experience. Our uses of these cookies fall into the following general categories

1. **Strictly necessary cookies** – enable you to use the basic functions of our website. Without the strictly necessary cookies, one cannot use the website properly;
2. **Performance cookies** – collect information about how visitors use the site, such as analytical cookies. These cookies cannot be used to directly identify a specific user;

3. **Targeting cookies** – are used to identify visitors between different websites, e.g. content creation partners, advertising networks. These cookies may be used by companies to create profiles of user interests or display relevant ads on other websites;
 4. **Functionality cookies** – are used for additional purposes regarding the proper functionality of the website (for example language preferences and user authentication), however cannot be classified as the strictly necessary cookies.
3. **Analytics.** We may use Technologies and other third-party tools to process analytics information on our Services. Some of our analytics partners include:
1. **Google Analytics.** For more information, please visit [Google Analytics' Privacy Policy](#). To learn more about how to opt-out of Google Analytics' use of your information, please click [here](#).
 2. **HubSpot.** For more information about HubSpot, please see [HubSpot's Privacy Policy](#);
 3. **Amplitude.** For more information about Amplitude, please see [Amplitude's Privacy Notice](#);
 4. **Datadog.** For more information about Datadog, please see [Datadog's Privacy Policy](#);
4. **Social Media Platforms.** Our Services may contain social media buttons such as LinkedIn and X (that might include widgets or other interactive mini programs). These features may collect your IP address, which page you are visiting on our Services, and may set a cookie to enable the feature to function properly. Your interactions with these platforms are governed by the privacy policy of the company providing it.

Information Collected from Other Sources

We may obtain information about you from other sources, including through third-party services and organizations. For example, if you access our Services through a third-party application social networking site, we may collect information about you from that third-party application that you have made available via your privacy settings.

3. HOW WE USE YOUR INFORMATION

We use your information for a variety of business purposes, including to provide our Services, for administrative purposes, and to market our products and Services, as described below.

Provide Our Services

We use your information to fulfil our contract with you and provide you with our Services, such as:

1. Managing your information and accounts;
2. Providing access to certain areas, functionalities, and features of our Services;
3. Answering requests for customer or technical support;
4. Communicating with you about your account, activities on our Services, and policy changes;
5. Processing your financial information and other payment methods for products or Services purchased.

Administrative Purposes

We use your information for various administrative purposes, such as:

1. Pursuing our legitimate interests such as direct marketing, research and development (including marketing research), network and information security, and fraud prevention;
2. Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity;
3. Measuring interest and engagement in our Services;
4. Short-term, transient use, such as contextual customization of ads;
5. Improving, upgrading or enhancing our Services;
6. Developing new products and Services;
7. Ensuring internal quality control and safety;
8. Authenticating and verifying individual identities, including requests to exercise your rights under this policy;
9. Debugging to identify and repair errors with our Services;
10. Auditing relating to interactions, transactions and other compliance activities;
11. Enforcing our agreements and policies; and
12. Complying with our legal obligations.

Marketing and Advertising our Products and Services

We may use personal information to tailor and provide you with content and advertisements. We may provide you with these materials as permitted by applicable law.

Some of the ways we market to you include email campaigns, custom audiences advertising, and “interest-based” or “personalized advertising,” including through cross-device tracking.

If you have any questions about our marketing practices or if you would like to opt out of the use of your personal information for marketing purposes, you may contact us at any time as set forth in “Contact Us” below.

Other Purposes

We also use your information for other purposes as requested by you or as permitted by applicable law. We may use personal information for other purposes that are clearly disclosed to you at the time you provide personal information or with your consent.

4. HOW WE DISCLOSE YOUR INFORMATION

We disclose your information to third parties for a variety of business purposes, including to provide and improve our Services, to protect us or others, to the extent required to meet a legal obligation, as described below.

Disclosures to Provide our Services

The categories of third parties with whom we may share your information are described below.

1. **Service Providers.** We may share your personal information with our third-party service providers who use that information to help us provide our Services. This includes service providers that provide us with IT support, hosting, payment processing, customer service, and related services.
2. **Business Partners.** We may share your personal information with business partners to provide you with a product or service you have requested. We may also share your personal information to business partners with whom we jointly offer products or services.
3. **Affiliates.** We may share your personal information with our company affiliates.
4. **Advertising Partners.** We may share your personal information with third-party advertising partners. These third-party advertising partners may set technologies and other tracking tools on our Services to collect information regarding your activities and your device (e.g., your IP address, cookie identifiers, page(s) visited, location, time of day). These advertising partners may use this information (and similar information collected from other services) for purposes of delivering personalized advertisements to you when you visit digital properties within their networks. This practice is commonly referred to as “interest-based advertising” or “personalized advertising.”

Disclosures to Protect Us or Others

We may access, preserve, and disclose any information we store associated with you to external parties if we, in good faith, believe doing so is required or appropriate to: comply with law enforcement or national security requests and legal process, such as a court order or subpoena; protect your, our, or others’ rights, property, or safety; enforce our policies

or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.

Disclosure to the Extent Required to Meet a Legal Obligation

We may be required to disclose personal data to the extent required to meet a legal obligation, including national security or law enforcement obligations and applicable law, rule, order, or regulation.

Additional Information

When sharing your personal data with third-party service providers and/or processors, we will: (a) restrict such sharing to specific and defined purposes; (b) mandate that the entity ensures a privacy protection level at least equivalent to that outlined in this Privacy Policy; (c) implement reasonable measures to ensure the processor handles the transferred Personal Information in line with our Privacy Policy obligations; (d) require the entity to inform us if it's unable to maintain the required level of protection as per this Privacy Policy; (e) promptly take necessary actions upon notification to cease and address any unauthorized processing; and (f) furnish a summary or pertinent privacy provisions excerpt from our contract with the processor to the Department of Commerce upon request.

When sending SMS messages for transactional purposes, we do not share any mobile information collected or processed by us with third parties or affiliates for marketing or promotional purposes. For the avoidance of doubt, this restriction applies to all use of Zoom Phone.

5. YOUR PRIVACY CHOICES AND RIGHTS

Your Privacy Choices. The privacy choices you may have about your personal information are determined by applicable law and are described below.

- 1. Email and Telephone Communications.** If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. Note that you will continue to receive transaction-related emails regarding products or Services you have requested. We may also send you certain non-promotional communications regarding us and our Services, and you will not be able to opt out of those communications (e.g., communications regarding our Services or updates to our Terms or this Privacy Policy).
- 2. Cookies and Interest-Based Advertising.** You may stop or restrict the placement of Cookies on your device or remove them by adjusting your preferences as your browser or device permits. However, if you adjust your preferences, our Services may not work properly.

Detailed information on changing browser settings regarding cookies and their removal can be obtained on the official website of a specific browser. In particular, the above information can be found at the following website addresses:

1. [Firefox web browser;](#)
2. [Chrome web browser;](#)
3. [Microsoft Edge web browser;](#)

4. Opera web browser;
5. Safari web browser.

Please note you must separately opt out in each browser and on each device.

Your Privacy Rights. In accordance with applicable law, you may have the right to:

1. **Access personal information** about you, including: (i) confirming whether we are processing your personal information; (ii) obtaining access to or a copy of your personal information; and (iii) receiving an electronic copy of personal information that you have provided to us, or asking us to send that information to another company (the “right of data portability”);
2. **Request correction** of your personal information where it is inaccurate or incomplete.;
3. **Request deletion** of your personal information;
4. **Request restriction** of or object to our processing of your personal information;
5. **Withdraw your consent** to our processing of your personal information;
6. **Transfer your personal data**;
7. **Object to the processing** of personal data;
8. **Lodge a complaint** with the supervisory authority.

If you would like to exercise any of these rights, please contact us as set forth in “Contact Us” below. We will process such requests in accordance with applicable laws.

6. SECURITY OF YOUR

INFORMATION

Zowie ensures the protection of personal data that it processes. In particular, we use appropriate technical safeguards and organizational measures to ensure the protection of personal data being processed, appropriate to the threats and categories of data protected. In particular, we protect data against disclosure to unauthorized persons, removal by an unauthorized person, processing in violation of the provisions of law, as well as change, loss, damage or destruction.

In addition, our organization has also been a subject of Service Organization Control 2 (SOC 2[®]) Type 2 Report to ensure that the personal data are safeguarded.

By using our Services or providing personal information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of our Services. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on our Services, by mail or by sending an email to you.

7. INTERNATIONAL DATA TRANSFERS

All information processed by us may be transferred, processed, and stored anywhere in the world, including, but not limited to, the United States or other countries, which may have data protection laws that are different from the laws where you live. We endeavor to safeguard your information

consistent with the requirements of applicable laws.

To ensure safe data transfer, we use services provided by entities based in countries for which the European Commission has determined that they provide an adequate level of protection, services that process personal data on the basis of Standard Contractual Clauses adopted by the European Commission, referred to in art. 46 of the General Data Protection Regulation (GDPR), concluded between Zowie and this entity or entities who take part in the Data Privacy Framework program.

8. RETENTION OF PERSONAL INFORMATION

We store the personal information we collect as described in this Privacy Policy for as long as you use our Services or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

To provide detailed information, personal data processed for the purpose of:

1. contacting a person who used the contact form (to book the demo of Zowie's product) – are processed for a period of 6 months from the date the correspondence ends;
2. ensuring the proper performance of the functionalities of the website (strictly necessary cookies), that is performance of the contracts – are processed for the period of performance of the contracts and the period necessary to assert own claims or

defend against claims made against us in connection with the performance of the contract;

3. marketing (through sending the newsletter on Zowie's activities)
 - are processed until the you object or withdraws consent to receive commercial information;
4. keeping statistics and analysis of your behavior on the website
 - are processed for a period of 3 years from the date of collection.

9. CHILDREN'S INFORMATION

The Services are not directed to children under 13 (or other age as required by local law), and we do not knowingly collect personal information from children.

If you are a parent or guardian and believe your child has uploaded personal information to our site without your consent, you may contact us as described in "Contact Us" below. If we become aware that a child has provided us with personal information in violation of applicable law, we will delete any personal information we have collected, unless we have a legal obligation to keep it, and terminate the child's account.

10. OTHER PROVISIONS

Third-Party Websites/Applications. The Services may contain links to other websites/applications and other websites/applications may reference or link to our Services. These third-party services are not controlled by us. We encourage our users to read the privacy policies of each website and application with which they interact. We do not endorse, screen or approve, and are not responsible for, the privacy practices or content of such other websites or applications. Providing personal information to third-party websites or applications is at your own risk.

Supervisory Authority. If you are located in the European Economic Area, Switzerland, the United Kingdom, you have the right to lodge a complaint with a supervisory authority if you believe our processing of your personal information violates applicable law.

Changes to our Privacy Policy. We may revise this Privacy Policy (which is available on our website: <https://getzowie.com/>) from time to time in our sole discretion. If there are any material changes to this Privacy Policy, we will notify you as required by applicable law. You understand and agree that you will be deemed to have accepted the updated Privacy Policy if you continue to use our Services after the new Privacy Policy takes effect. We pledge to regularly review and validate the accuracy of this Privacy Policy, ensuring that our company adheres to the DPF Principles, and taking corrective actions to address any identified issues.

11. DATA PRIVACY FRAMEWORK INFORMATION

Jurisdiction over our compliance. The Federal Trade Commission (<https://www.ftc.gov/>) has jurisdiction over Zowie's compliance with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF).

Binding arbitration. You have the possibility, under certain conditions, to invoke binding arbitration for complaints regarding DPF compliance not resolved by any of the other DPF mechanisms. Paragraph C (Pre-Arbitration Requirements) of Annex I of the DPF Principles explains in detail when an individual can invoke binding arbitration. – here you can find more information regarding this matter: [ANNEX-I-introduction](#).

Liability for onward transfer. In case of an onward transfer of your personal data to third parties, Zowie has responsibility for the processing of personal information it receives under the DPF Principles and subsequently transfers to a third party acting as a processor on its behalf. Zowie shall remain liable under the DPF Principles if its processor processes such personal information in a manner inconsistent with the DPF Principles, unless we prove that we are not responsible for the event giving rise to the damage.

If you access our website from a country different from where our servers are situated, your interactions with us will involve the international transfer of information. By using our website and communicating with us electronically, you agree to such cross-border transfers. For data transfers from the EEA, Switzerland and the UK, relevant DPF provisions apply.

12. CONTACT US

If you have any questions about our privacy practices or this Privacy Policy, you want to contact us with any inquiries or complaints, or to exercise your rights as detailed in this Privacy Policy or by applicable provisions of law,

please contact us at:

Zowie, Inc.

8 The Green, Dover

DE 19901, USA

contact@zowie.ai

We will respond within 45 days of receiving inquiry or complaint.

Independent Dispute Resolution. In compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, Zowie commits to refer unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF to JAMS, an alternative dispute resolution provider based in the United States. If you do not receive timely acknowledgment of your DPF Principles-related complaint from us, or if we have not addressed your DPF Principles-related complaint to your satisfaction, please visit <https://www.jamsadr.com/DPF-Dispute-Resolution> for more information or to file a complaint. The services of JAMS are provided to consumers at no cost.