

## Privacy Policy

Effective date: 04/07/26

At Alterion, we take your privacy seriously. Please read this Privacy Policy to learn how we treat your personal data. **By using or accessing our website(s), products or services (the “Services”) in any manner, you acknowledge that you accept the practices and policies outlined below, and you hereby consent to our collection, use and disclosure of your Personal Data as described in this Privacy Policy.**

Remember that your use of Alterion’s Services is at all times subject to our terms of use or similar terms that incorporate this Privacy Policy. Any terms we use in this Policy without defining them have the definitions given to them in such terms.

You may print a copy of this Privacy Policy by clicking [here](#).

As we continually work to improve our Services, we may need to change this Privacy Policy from time to time. We will alert you of material changes by placing a notice on our website, by sending you an email and/or by some other means. Please note that if you’ve opted not to receive legal notice emails from us (or you haven’t provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them. If you use the Services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes.

### What This Privacy Policy Covers

This Privacy Policy covers how Alterion collects and processes data that identifies or relates to you (“Personal Data”) This Privacy Policy does not cover the practices of companies we don’t own or control or people we don’t manage.

## Personal Data We May Collect

Device or Web Data. If you interact with us online (e.g., by visiting our website or using our web-based Services), we may collect information about your device and/or browser such as your IP address, IP address-based location data, device ID, and type of device or operating system used to connect with us.

Contact Data. If you sign up for a demo, subscribe to our newsletters or other communications, or otherwise sign up for our Services, we may collect your contact information such as your name, email, phone number, employer, and job title.

Account Data. If you create an account to use our Services, we collect login credentials and other profile data.

Other Personal Data. We may collect other Personal Data that you make available through Services or to us, such as in emails, letters, texts, or other communications you send us.

## Sources of Personal Data

From You. We collect Personal Data when you provide it directly to us (e.g., you create an account or contact us). We also collect certain Personal Data (such as Device or Web Data) automatically when you use our Services (e.g., through Cookies – as defined in the “Cookies” section below), or if you download or install an application as part of our Services.

Third Parties. We may collect Personal Data from such as:

- Vendors that provide analytics on how you interact and engage with our Services or that help provide you with customer support. We may also use Vendors to help generate leads.
- Advertising Partners who may assist us with marketing or promotional services related to how you interact with our websites, applications, products, Services, advertisements or communications.
- Third Party Credentials that you provide to us or use to sign-in to the Services, such as your social network account credentials, to us or otherwise sign in to the Services through a third-party site or service, some content and/or information in those accounts may be transmitted into your account with us.

## Purpose for Collection and Processing Personal Data

To Provide, Customize, and Improve our Services.

- Creating and managing your account or other user profiles.
- Processing orders or other transactions; billing.
- Providing you with the products, services or information you request.
- Meeting or fulfilling the reason you provided the information to us.
- Providing support and assistance for the Services.

- Improving the Services, including testing, research, internal analytics and product development.
- Personalizing the Services, website content and communications based on your preferences.
- Doing fraud protection, security and debugging.

#### Marketing our Services

- Marketing and selling the Services.
- Showing you advertisements, including targeted advertising.

#### Corresponding with You

- Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about the Company or the Services.
- Sending emails and other communications according to your preferences.

#### Legal or Security

- Meeting legal requirements and enforcing legal terms.
- Preventing, detecting and investigating security incidents and potentially illegal or prohibited activities.
- Protecting the rights, property or safety of you, Alterion or another party.
- Enforcing any agreements with you; responding to claims that any posting or other content violates third-party rights; and resolving disputes.

### **Who We May Share Personal Data With**

Service Providers. These parties help us provide the Services or perform business functions on our behalf. They may include: hosting, technology and communication providers; security and fraud prevention consultants; support and customer service vendors; product fulfillment and delivery providers; analytics providers that analyze the use of our Services;

Advertising Partners. These parties help us market our Services and provide you with other offers that may be of interest to you. They may include: ad networks, data brokers, marketing providers, and analytics providers who help with our lead generation or targeted advertising efforts.

Business Partners. These parties partner with us in offering various services. They may include businesses that you have a relationship with, and companies that we partner with to offer joint promotional offers or opportunities.

Parties You Authorize, Access or Authenticate. This includes third parties you access or interact with through the Services, social media services, and other users.

Others. We may disclose any Personal Data that we collect with third parties in conjunction

with any of the activities set forth under the “Legal or Security” subsection above. Additionally, all of your Personal Data that we collect may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part).

## Cookies

The Services use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, “Cookies”) that may collect or facilitate the collection of your Personal Data for various purposes. We may also supplement the information we collect via Cookies with information received from third parties, including third parties that have placed their own Cookies on your device(s).

We use the following types of Cookies:

- Essential Cookies. Essential Cookies are required for providing you with features or services that you have requested. For example, certain Cookies enable you to log into secure areas of our Services. Disabling these Cookies may make certain features and services unavailable.
- Functional Cookies. Functional Cookies are used to record your choices and settings regarding our Services, maintain your preferences over time and recognize you when you return to our Services.
- Performance/Analytical Cookies. Performance/Analytical Cookies allow us to understand how visitors use our Services. They do this by collecting information such as the number of visitors to the Services, what pages visitors view on our Services and how long visitors are viewing pages on the Services. These Cookies help us better understand users of our Services and can also help us measure our targeted advertising efforts.
- Retargeting/Advertising Cookies. Retargeting/Advertising Cookies collect data about your online activity and identify your interests so that we can provide advertising that we believe is relevant to you.

Most internet browsers have an option for turning off the Cookie feature, which will prevent your browser from accepting new Cookies, as well as (depending on your browser software) allow you to decide on acceptance of each new Cookie in a variety of ways. You can also delete all Cookies that are already on your device. If you do this, however, you may have to manually adjust some preferences every time you visit our website and some of the Services and functionalities may not work.

You can also modify your Cookie preferences through our website’s Cookie management settings which is available at [alterion.ai](http://alterion.ai).

To find out more information about Cookies generally, including information about how to manage and delete Cookies, please visit <http://www.allaboutcookies.org/> or <https://ico.org.uk/for-the-public/online/cookies/> if you are located in the United Kingdom.

## **Data Security and Retention**

Although we work to protect the security of your account and Personal Data that we hold in our records, please be aware that no method of transmitting data over the internet or storing data is completely secure. You can help protect your Personal Data by practicing password hygiene – for example, by creating strong and unique passwords; securing your password and/or other sign-on mechanism; limiting access to your computer or device and browser; and signing off after you have finished accessing your account.

We retain Personal Data about you for as long as necessary to provide you with our Services or to perform our business or commercial purposes for collecting your Personal Data. When establishing a retention period for certain categories of Personal Data, we consider who we collected the data from, our need for the Personal Data, why we collected the Personal Data, and the sensitivity of the Personal Data. In some cases we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule or regulation. We may further retain information in an anonymous or aggregated form where that information would not identify you personally.

## **Personal Data of Children**

We do not knowingly collect or solicit Personal Data from children under 18 years of age; if you are a child under the age of 18, please do not attempt to register for or otherwise use the Services or send us any Personal Data. If we learn we have collected Personal Data from a child under 18 years of age, we will delete that information as quickly as possible. If you believe that a child under 18 years of age may have provided Personal Data to us, please contact us at [support@alterion.ai](mailto:support@alterion.ai).

## **European Union and United Kingdom Residents**

If you are a resident of the European Union (“EU”), United Kingdom (“UK”), Lichtenstein, Norway or Iceland, you may have additional rights under the EU or UK General Data Protection Regulation (the “GDPR”) with respect to your Personal Data, as outlined below.

For this section, we use the terms “Personal Data” and “processing” as they are defined in the GDPR, but “Personal Data” generally means information that can be used to individually identify a person, and “processing” generally covers actions that can be performed in connection with data such as collection, use, storage and disclosure. Alterion will be the controller of your Personal Data processed pursuant to this Privacy Policy.

If there are any conflicts between this section and any other provision of this Privacy Policy, the policy or portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following applies to you, please contact us at Alterion. Note that we may also process Personal Data of our customers’ end users or employees in connection with our provision of certain services to customers, in which case we are the processor of Personal Data. If we are the processor of

your Personal Data (i.e., not the controller), please contact the controller party in the first instance to address your rights with respect to such data.

### Personal Data Use and Processing Grounds

The “Our Commercial or Business Purposes for Collecting Personal Data” section above explains how we use your Personal Data.

We will only process your Personal Data if we have a lawful basis for doing so. Lawful bases for processing include consent, contractual necessity and our “legitimate interests” or the legitimate interest of others, as further described below.

- Contractual Necessity: We may process certain categories of Personal Data as a matter of “contractual necessity”, meaning that we need to process the data to perform under our Terms of Use with you, which enables us to provide you with the Services. When we process data due to contractual necessity, failure to provide such Personal Data will result in your inability to use some or all portions of the Services that require such data.
- Legitimate Interest: We may process certain categories of Personal Data when we believe it furthers the legitimate interest of us. We may also de-identify or anonymize Personal Data to further our legitimate interests. Examples of these legitimate interests include (as described in more detail above):
  - Providing, customizing and improving the Services.
  - Marketing the Services.
  - Corresponding with you.
  - Meeting legal requirements and enforcing legal terms.
  - Completing corporate transactions.
- Consent: In some cases, we process Personal Data based on the consent you expressly grant to us at the time we collect such data. When we process Personal Data based on your consent, it will be expressly indicated to you at the point and time of collection.
- Other Processing Grounds: From time to time we may also need to process Personal Data to comply with a legal obligation, if it is necessary to protect the vital interests of you or other data subjects, or if it is necessary for a task carried out in the public interest.

### EU, UK and Swiss Data Subject Rights

You have certain rights with respect to your Personal Data, including those set forth below. For more information about these rights, or to submit a request, please email us at [support@alterion.ai](mailto:support@alterion.ai). Please note that in some circumstances, we may not be able to fully comply with your request, such as if it is frivolous or extremely impractical, if it jeopardizes the rights of others, or if it is not required by law, but in those circumstances, we will still respond to notify you of such a decision. In some cases, we may also need you to provide us with additional information, which may include Personal Data, if necessary to verify your identity and the nature of your request.

- **Access:** You can request more information about the Personal Data we hold about you and request a copy of such Personal Data.
- **Rectification:** If you believe that any Personal Data we are holding about you is incorrect or incomplete, you can request that we correct or supplement such data.
- **Erasure:** You can request that we erase some or all of your Personal Data from our systems.
- **Withdrawal of Consent:** If we are processing your Personal Data based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any time. Please note, however, that if you exercise this right, you may have to then provide express consent on a case-by-case basis for the use or disclosure of certain of your Personal Data, if such use or disclosure is necessary to enable you to utilize some or all of our Services.
- **Portability:** You can ask for a copy of your Personal Data in a machine-readable format. You can also request that we transmit the data to another controller where technically feasible.
- **Objection:** You can contact us to let us know that you object to the further use or disclosure of your Personal Data for certain purposes, such as for direct marketing purposes.
- **Restriction of Processing:** You can ask us to restrict further processing of your Personal Data.
- **Right to File Complaint:** You have the right to lodge a complaint about Alterion's practices with respect to your Personal Data with the supervisory authority of your country or EU Member State. A list of Supervisory Authorities is available here: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en).

### Transfers of Personal Data

The Services are hosted and operated in the United States ("U.S.") through Alterion and its service providers, and if you do not reside in the U.S., laws in the U.S. may differ from the laws where you reside. By using the Services, you acknowledge that any Personal Data about you, regardless of whether provided by you or obtained from a third party, is being provided to Alterion in the U.S. and will be hosted on U.S. servers, and you authorize Alterion to transfer, store and process your information to and in the U.S., and possibly other countries. In some circumstances, your Personal Data may be transferred to the U.S. pursuant to a data processing agreement incorporating standard data protection clauses.

### **State Law Privacy Rights**

#### California Resident Rights

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to contact us to prevent disclosure of Personal Data to third parties for such third parties' direct marketing purposes; in order to submit such a request, please contact us at [support@alterion.ai](mailto:support@alterion.ai).

Our Services do not support Do Not Track requests at this time. To find out more about “Do Not Track,” you can visit [www.allaboutdnt.com](http://www.allaboutdnt.com).

### Nevada Resident Rights

If you are a resident of Nevada, you have the right to opt-out of the sale of certain Personal Data to third parties. Please note that we do not currently sell your Personal Data as sales are defined in Nevada Revised Statutes Chapter 603A.

### **Contact Information:**

If you have any questions or comments about this Privacy Policy or the ways in which we collect and use your Personal Data, please do not hesitate to contact us at:

- [www.alterion.ai/](http://www.alterion.ai/)
- [support@alterion.ai](mailto:support@alterion.ai)
- 201 Third St., Suite 940, San Francisco, CA 94103

If you are located in the EU or UK, you may use the following information to contact our EU or UK-Based Member Representative:

- EU Member Rep: Chief Operating Officer, 201 Third St., Suite 940, San Francisco, CA 94103, [info@alterion.ai](mailto:info@alterion.ai)
- UK Member Rep: Chief Operating Officer, 201 Third St., Suite 940, San Francisco, CA 94103, [info@alterion.ai](mailto:info@alterion.ai)