

PRIVACY

Privacy Notice

Last updated October 2, 2025

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1. Introduction

Privaini, Inc. ("Privaini", "we" or "us") offers privacy risk management platform to businesses and government organizations. We believe that exceptional products and services should be based on the

collection of as little personal information as possible. We believe that privacy is a fundamental right and it's the foundation of our design philosophy.

In this privacy policy ("Privacy Policy"), personal information means information, that either by itself or in combination with other information, enables an individual to be directly or indirectly identified ("Personal Information"). Some laws define personal information differently and we use those definitions when they are applicable. Rest assured, that no matter where you live, we treat your personal information with respect, and collect, use and share it as described in this Privacy Policy.

This Privacy Policy aims to inform you about how we collect, use, disclose and store Personal Information in our role as a controller of Personal Information and covers the Personal Information that we collect through privaini.com (the "Website"), emails, products, services, and customer support (collectively, including the Website, the "Services") owned or controlled by us.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Services. By accessing or using any of our Services, you agree to this privacy policy.

This Privacy Policy does not apply to how any third parties define personal information or how they use it. We encourage you to read their privacy policies and know your privacy rights before interacting with them.

2. Changes To This Privacy Policy

We may change our Privacy Policy and practices over time and will update this Privacy Policy from time to time to reflect changes in our practices, technologies, legal requirements, and other factors. If we make changes to this Policy, we will notify you by revising the last updated date of the Privacy Policy. We encourage you to periodically review this Privacy Policy to stay informed about our collection, processing and sharing of your Personal Information. Your continued use of our Services after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

You can view this information at any time online at www.privaini.com/terms/privacy-policy.

3. Types of Personal Information Collected Directly, Their Use and Respective Legal Bases

At Privaini, we believe you can have great products and great privacy. This means we strive to collect only the Personal Information that we need. When you visit our Website, use our Services or interact with us in-person (including via email, phone or other electronic messages), we may collect the following categories of Personal Information. Not all categories may be collected about every individual.

Personal Information does not include publicly available information, such as information lawfully made available from government records, information we have a reasonable basis to believe is lawfully made available to the general public by you or by widely distributed media, or by a person to whom you have disclosed the information and not restricted it to a specific audience, or deidentified or aggregated information.

The following provides examples of the type of information that we collect from you and how we use that information.

Categories of Personal Information	Types of Personal Information Collected from You	Our Use of Your Personal Information and Our Legal Bases
Personal Identifiers	We collect business contact information such as name, business email, business contact information, and password from our customers and their employees with whom we may interact.	We have a legitimate interest in contacting our current, past and potential customers and communicating with them concerning normal business administration such as fulfilling our contract to provide Services, usage and billing, improving our Services, marketing and promotion of our Service, and detecting potential fraudulent issues.
Internet & Network Activity	We use cookies. "Cookies" (also known as tags or tracking pixels) are small pieces of data that come from a website and are stored on a user's computer during browsing. We do not use the type of cookies that track your activities across the internet. Third parties may use cookies and clear GIFs.	We have a legitimate interest in making our Website operate efficiently, including among other things keeping you signed in, and in understanding how visitors securely interact with our Website and have third parties provide statistical user information to us anonymously.
Device and Usage Information	This information may include identifiers, IP address, device and application information, browser type, and date and time stamps associated with your usage.	We have a legitimate interest in providing Services in a secure manner and in receiving and acting upon your feedback, issues, or inquiries.
Sensitive Identifiers, Professional, and Education Information	When you apply for a job, or become an employee, we collect information necessary to process your application or to retain you as an employee. This may include, among other	We use information about current employees to perform our contract of employment, the anticipation of a contract of employment with you, or to comply with our legal

Categories of Personal Information	Types of Personal Information Collected from You	Our Use of Your Personal Information and Our Legal Bases
	things, government issued identification and other information required for employment eligibility verification. Providing this information is required for employment.	obligations, or as otherwise required by law. We also have a legitimate interest in using your information to have efficient staffing and work force operations.
Commercial Information	We collect your name, business name, billing address, shipping address, business e-mail, and business phone number.	We use and share your information to perform our contract to provide you with products or services.
Internet & Network Activity	We use technology to monitor how you interact with our website. This may include which links you click on, or information that you type into our online forms. This may also include information about your device or browser (as further described in Device and Usage Information section above). We collect information, including your browser type, operating system, Internet Protocol (IP) address, domain name, click-activity, referring website, and/or a date/time stamp for visitors.	We have a legitimate interest in understanding how you interact with our Website and Services to better improve them, and to understand your preferences and interests in order to select offerings that you might find most useful. We also have a legitimate interest in monitoring our networks and the visitors to our websites to understand which of our Services is the most popular and to detect and prevent fraud. For example, we use Google Analytics, which allows us to review overall website usage to identifying behavior patterns and improve the website experience for users. To learn more about Google's privacy practices, please review the Google Privacy Policy at https://www.google.com/policies/privacy/partners/. You can also download the Google

Categories of Personal Information	Types of Personal Information Collected from You	Our Use of Your Personal Information and Our Legal Bases
		Analytics Opt-out Browser Add-on to prevent your data from being used by Google Analytics at https://tools.google.com/dlpage/gaoptout .

Although the sections above describe our primary purpose in collecting your information, in many situations we have more than one purpose. For example, if you sign up for Services, we may collect your information to complete that transaction, but we also collect your information as we have a legitimate interest in maintaining your information after your transaction is complete so that we can quickly and easily respond to any questions about your Services. As a result, our collection and processing of your information is based in different contexts upon your consent, our need to perform a contract, our obligations under law, and/or our legitimate interest in conducting our business.

4. Types of Personal Information Collected From Other Sources

We also collect information about you from other sources including partners who provide us with publicly and externally available information which may contain Personal Information. Additionally, the Personal Information we collect to provide our Services may include information from third parties, which helps us offer features like identity management and multi-factor authentication. We may combine this information with Personal Information provided by you.

5. Sharing of Personal Information Collected

In addition to the specific situations discussed elsewhere in this Privacy Policy, we disclose information in the following situations:

Affiliates and Acquisitions. We may share information with our subsidiary to the extent such sharing of data is necessary to fulfill a request you have submitted via our Website or for customer support, technical operations, and account management purposes. If another company acquires, or plans to acquire, our company, business, or our assets, we will also share information with that company, including at the negotiation stage.

Other Disclosures in Compliance with Legal Obligations and Requirements. We may disclose information in response to subpoenas, warrants, or court orders, or in connection with any legal process, or to comply with relevant laws. We may also share your information to establish or exercise our rights, to defend against a legal claim, to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our policies, or to comply with your request for the provision of Services by a third-party intermediary.

Professional Advisers. In individual instances, we may share your Personal Information with professional advisers acting as service providers, processors, or joint controllers — including lawyers, bankers, auditors, and insurers who provide consultancy, banking, legal, insurance and accounting services, and to the extent we are legally obliged to share or have a legitimate interest in sharing your Personal Information.

Public Authorities. With public and government authorities, to the extent we are compelled to disclose Personal Information to comply with our legal obligations.

Service Providers. We share your information with our contracted service providers, who support us in delivering and improving our services. These providers offer functions such as IT and system administration, hosting, research, analytics, marketing, and customer support for the purposes and pursuant to the legal bases described above. Service providers help us authenticate users, administer our Website, provide technical support, process payments, and assist in the fulfillment of orders.

Our current service providers include, but are not limited to:

- **Amazon Web Services, Inc. (AWS)** — Cloud hosting and storage.
- **Microsoft Corporation** — Productivity and cloud services.
- **Salesforce, Inc.** — Customer relationship management
- **Atlassian Pty Ltd** — Collaboration and issue tracking.
- **Auth0 (by Okta)** — Identity and access management.

Third-Party Networks and Websites. With third-party social media networks and websites, so that Privaini can market and advertise on third party platforms and websites.

6. No Sale of Personal Information Collected

We do not sell your Personal Information.

7. Retention and Storage of Personal Information Collected

We retain your Personal Information only for as long as necessary to fulfill the purposes for which it was collected, including to comply with legal, regulatory, accounting, or reporting requirements. The criteria we use to determine retention periods include:

- **Legal and Regulatory Requirements.** We retain Personal Information for as long as required by applicable laws and regulations.
- **Business Needs.** We retain Personal Information as long as necessary to provide our Services, maintain business records, and manage our relationship with you.
- **Dispute Resolution.** We retain Personal Information as long as necessary to resolve disputes and enforce our agreements.
- **Security and Fraud Prevention.** We retain Personal Information as long as necessary to detect, prevent, and respond to security incidents and fraud.

Once the retention period expires, we will securely delete or anonymize your Personal Information in accordance with applicable laws and regulations.

General Personal Information Retention Period

Data Category	Retention Period	Rationale
Varies by category	As described above	Retention periods depend on legal, regulatory and business needs as outlined in this section.

8. Protection of Personal Information Collected

We use administrative, technical, and physical safeguard to protect your Personal Information, taking into account the nature of the personal information, the processing and the threats posed.

Though we work to keep your Personal Information secure, no method of transmission over the Internet, or method of electronic storage, is fully secure. While we use reasonable efforts to protect your Personal Information from unauthorized access, use, or disclosure, we cannot guarantee the security of your Personal Information. In the event that we are required by law to inform you of a breach to your Personal Information we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

Our Website permits you to create an account. When you do you will be prompted to create a password. You are responsible for maintaining the confidentiality of your password, and you are responsible for any access to or use of your account by someone else that has obtained your password, whether or not such access or use has been authorized by you. You should notify us of any unauthorized use of your password or account.

9. Your Privacy Rights

Privaini offers Services to businesses and government organizations and your employer may have shared your Personal Information with us so that we can offer Services to you on behalf of your employer. You may exercise your rights at any time, irrespective of where you are located, and our contact information is provided in this Privacy Policy.

Right	Description
Right to Access (in portable data format), Correct and Delete	You have the right to (i) request to know more about and access your Personal Information, including in a portable data format, (ii) request correction of inaccurate Personal Information and (iii) request deletion of your Personal Information. To request access, correction or deletion, of your Personal Information, please email privacy@privaini.com . Once we receive the

Right	Description
	request, we will validate the information that you provide and send a message to the email address you provided in the request. Please follow the instructions in that email to verify your email address and/or provide any additional information that may be needed to process your request.
Right to Opt-Out of Sale	We do not sell your Personal Information.
Right to Opt-Out of Sharing	We describe in Section 5 how we share of your Personal Information. You may opt out of these activities by emailing us at privacy@privaini.com or by visiting us and updating your opt-out preference signal through our Global Privacy Control feature at the www.privaini.com .
Right to Limit Use and Disclosure of Sensitive Personal Information	We do not engage in uses or disclosures of Personal Information that would trigger the right to limit use of sensitive Personal Information.
Right to Non-Discrimination	We will not discriminate against any individual for exercising their rights.
Right to Appeals	If we deny your request, you may to appeal our decision by contacting us at privacy@privaini.com . If you have concerns about the result of an appeal, you may contact the California Attorney General at https://oag.ca.gov .

10. Children's Privacy

Our Website and other Services are designed for businesses and government organizations are not directed at children. We do not knowingly collect or solicit Personal Information from anyone under the age of 18. If you are under the age of 18, please do not attempt to register for the Services or send any Personal Information about yourself to us. If we learn that we have collected Personal Information from a child under the age 18, we will delete that information as quickly as possible. If you believe that a child under 18 may have provided us their Personal Information, please contact us at privacy@privaini.com.

Minimum age required: 18 years

11. Other Important Information

How to Manage Cookies.

There are many different types of cookies, and our Website uses the following:

- **Necessary Cookies:** Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.
- **Statistic Cookies:** Statistic cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously.
- **Marketing Cookies:** These cookies enable the website to provide enhanced functionality and personalization. They may be set by us or by third-party providers whose services we have added to our pages. If you do not allow these cookies, some or all of these services may not function properly.

Global Privacy Control (GPC).

You can use the Global Privacy Control (GPC) to signal your privacy choices by enabling this feature in your web browser or browser extension. GPC sends a signal to websites you visit, indicating your privacy preferences, such as opting out of the sale or sharing of your Personal Information. To activate GPC, look for the privacy settings in your browser or install a compatible extension. Once enabled, GPC will automatically communicate your preferences to participating websites, helping you maintain control over your data privacy. [When we receive this signal, we will process it as a valid request to opt-out request.] For more information on setting up GPC, visit the California Privacy Protection Agency's website at <https://oag.ca.gov/privacy/ccpa>.

You can at any time change or withdraw your consent from the Cookie Declaration on our website, <https://privaini.com/>.

Transmission Of Information to Other Countries.

Privaini is located in California, United States. Our service providers and other third parties you may interact with in connection with our Services may be located in the United States and other countries around the world. As a result, your information may be processed in a foreign country where privacy laws may be less stringent than the laws in your country. Nonetheless, where possible we take steps to treat Personal Information using the same privacy principles that apply pursuant to the law of the country in which we first received your information. By submitting your Personal Information to us you agree to the transfer, storage and processing of your information in a country other than your country of residence including, but not necessarily limited to, the United States.

Third Party Applications/Websites.

We have no control over the privacy practices of websites or applications that we do not own.

Accessibility.

If you are visually impaired, you may access this notice through your browser's audio reader.

12. For California Residents

If you are a resident of one of California, this section applies to you.

The California Consumer Privacy Act (as amended by the California Privacy Rights Act) requires businesses to disclose whether they sell or share Personal Information. We do not sell Personal Information. We may allow third parties to collect Personal Information from our Website or Services if those third parties are authorized service providers who have agreed to contractual limitations as to their retention, use, and disclosure of such Personal Information.

California law requires that we detail the categories of Personal Information that we disclose for certain “business purposes,” such as to affiliates, professional advisors and service providers, among others, that assist us with providing or marketing our Services, and to such other entities as described in Section 5 of this Privacy Policy. We disclose the categories of Personal Information for our business purposes such as identifiers, internet activity information, monitoring and providing our Services and employment-related information as described in Sections 3 and 4 of this Privacy Policy.

California law grants state residents certain rights, including the rights to know and access specific types of Personal Information, to learn how we process Personal Information, to request deletion of Personal Information, to request correction of Personal Information, to opt-out of sharing your Personal Information for third party advertising purposes, and not to be denied goods or services for exercising these rights and as further described in Section 9 of this Privacy Policy. If you are a California resident under the age of 18 and have registered for an account with us, you may ask us to remove content or information.

The California Consumer Privacy Act (as amended by the California Privacy Rights Act) requires businesses to disclose whether they sell or share Personal Information. As a business covered by this act, we do not sell Personal Information. [We may allow third parties to collect Personal Information from our Website or Services, for security and data analytics purposes, if those third parties are authorized service providers who have agreed to contractual limitations as to their retention, use, and disclosure of such Personal Information.]

For information on how to exercise your rights, please refer to “Contacting Us” below. If you are an authorized agent wishing to exercise rights on behalf of a California resident, please contact us using the information in the “Contacting Us” section above and provide us with a copy of the consumer’s written authorization designating you as their agent. We may need to verify your identity and place of residence before completing your rights request.

We do not discriminate against California residents who exercise any of their rights described in this Privacy Policy.

If you would like to opt-out of sharing using your cookie identifiers, turn on a Global Privacy Control in your web browser or browser extension as described in Section 11 of the Privacy Policy.

13. Additional Disclosures

By way of background, California, Colorado, Connecticut, Florida, Montana, Oregon, Texas, Utah, and Virginia have enacted consumer laws that protect their residents’ privacy and that grant their residents

certain rights and require additional disclosures. We operate in California and provide the rights provided under California law to all our users regardless of where they reside.

14. Contacting Us

We are committed to working with you to address any questions or concerns that you may have about your Personal Information and, where applicable, obtain a fair resolution of any complaint or concern about privacy. To exercise your rights regarding your Personal Information, or if you have questions regarding this Privacy Policy or our privacy practices, please contact us at:

Name Privaini Privacy Team

Postal Address Privaini, Inc.

3 E 3rd Ave, Suite 200

San Mateo, CA 94401

Email privacy@privaini.com

When you contact us, please indicate in which country and/or state you reside.