

Hedra

Privacy Policy

Effective as of October 25, 2024.

California Notice at Collection/State Law Privacy Rights: See the State law privacy rights section below for important information about your rights under applicable state privacy laws.

Hedra, Inc. (“Hedra,” “we,” “us” or “our”) provides a platform, including but not limited to a desktop, web, and mobile application, and tools driven by artificial intelligence (the “Hedra Platform”). This Privacy Policy describes how Hedra processes personal information that we collect through our digital or online properties or services that link to this Privacy Policy (including, as applicable, the Hedra Platform, our website and our social media pages) as well as our marketing activities, live events and other activities described in this Privacy Policy (collectively, the “Service”). Hedra may provide additional or supplemental privacy policies to individuals for specific products or services that we offer at the time we collect personal information.

While this Privacy Policy is generally intended to cover personal information that we process on behalf of our business customers while providing the Hedra Platform to them, our use of information that we process on behalf of our business customers through the Hedra Platform may be governed by separate agreements we have with such customers. In the event of any conflict or inconsistency between this Privacy Policy and the terms of our customer agreement, the terms of our customer agreement will control. If you have concerns regarding your personal information that we process on behalf of a business customer, please direct your concerns to that enterprise customer.

Notice to European Users: Please see the Notice to European Users section for additional information for individuals located in the European Economic Area or United Kingdom (which we refer to as “Europe”, and “European” should be understood accordingly) below.

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Personal information we collect

Information you provide to us. Personal information you may provide to us through the Service or otherwise includes:

- **Contact data**, such as your first and last name, salutation, email address, billing and mailing addresses, professional title and company name, and phone number.
- **Profile data**, such as the username and password that you may set to establish an online account on the Service, biographical details, photograph or picture, and any other information that you add to your account profile.
- **Communications data** based on our exchanges with you, including when you contact us through the Service or communicate with us via social media or otherwise.
- **Transactional and payment data**, such as information relating to or needed to complete your orders on or through the Service, including order numbers, transaction history and payment data such as payment card information or bank account number.
- **Marketing data**, such as your preferences for receiving our marketing communications and details about your engagement with them.
- **User-generated content**, such as messages, photos, images, audio or voice clips, music, videos, comments, questions, files, works of authorship, and other content or information that you upload/use as an input or prompt to, generate, transmit, or otherwise make available on the Service, as well as associated metadata. Metadata includes information on how, when, where and by whom a piece of content was collected and how that content has been formatted or edited. Metadata also includes information that users can add or can have added to their content, such as keywords, geographical or location information, and other similar data.
- **Derived data**. If you use certain features of the Hedra Platform, such as to convert images to videos, videos to new or different videos, or people to avatars, or to upload audio or voice clips, we may derive certain information, potentially including biometric data, from images of individual people or from audio or voice clips in order to provide those features. We will only use and share this derived data for limited purposes, as described in the "[How we use your personal information](#)" and "[How we share your personal information](#)" sections, below.
- **Other data** not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

We ask that you not provide us with any sensitive personal information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religious or other beliefs, health or genetic information, criminal background information, or similar data) on or through the Service or otherwise.

Third-party sources. We may combine personal information we receive from you with personal information that we obtain from other sources, such as:

- **Public sources**, such as government agencies, public records, social media platforms, and other publicly available sources.
- **Partners**, such as marketing partners and event co-sponsors.
- **Service providers** that provide services on our behalf or help us operate the Service or our business.
- **Business transaction partners**. We may receive personal information in connection with an actual or prospective business transaction. For example, we may receive your personal information from an entity we acquire or are acquired by, a successor, or assignee or any party involved in a business transaction such as a merger, acquisition, sale of assets, or

similar transaction, and/or in the context of an insolvency, bankruptcy, or receivership.

- **Third-party services**, such as social media services, that you use to log into, or otherwise link to, your Service account. This data may include your username, profile picture and other information associated with your account on that third-party service that is made available to us based on your account settings on that service.

Automatic data collection. We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and your interaction over time with the Service, our communications and other online services, such as:

- **Device data**, such as your computer or mobile device's operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers (including identifiers used for advertising purposes), language settings, mobile device carrier, radio/network information (e.g., Wi-Fi, LTE, 3G), and general location information such as city, state or geographic area.
- **Online activity data**, such as pages or screens you viewed, how long you spent on a page or screen, the website you visited before browsing to the Service, navigation paths between pages or screens, information about your activity on a page or screen, access times and duration of access, and whether you have opened our emails or clicked links within them.
- **Geolocation data** when you authorize the Service to access your device's location.
- **Communication interaction data** such as your interactions with our email or other communications (e.g., whether you open and/or forward emails) – we may do this through the use of pixel tags (which are also known as clear GIFs), which may be embedded invisibly in our emails.

For more information concerning our automatic collection of data, please see the "[Tracking Technologies](#)" section, below.

Tracking technologies

Cookies and other technologies. Some of our automatic data collection is facilitated by cookies and other technologies. For more information, including concerning your choices with respect to the use of tracking technologies, see our Cookie Notice and the [Your choices](#) section, below. We may store a record of your preferences in respect of the use of these technologies in connection with the Service.

How we use your personal information

We may use your personal information for the following purposes or as otherwise described at the time of collection:

Service delivery and operations. We may use your derived data and other personal information to:

- provide the Service;
- enable security features of the Service; and
- establish and maintain your user profile on the Service.

In addition to the above, we may use your personal information that is not derived data to:

- communicate with you about the Service, including by sending Service-related announcements, updates, security alerts, and support and administrative messages; and
- provide support for the Service, and respond to your requests, questions and feedback.

Service personalization, which may include using your personal information that is not derived data to:

- understand your needs and interests;
- personalize your experience with the Service and our Service-related communications; and
- remember your selections and preferences as you navigate webpages.

Service improvement and analytics. We may use your personal information, including derived data, to analyze your usage of the Service, improve the Service, improve the rest of our business, and to develop new products and services.

Marketing and advertising. We, our service providers and our third-party advertising partners may collect and use your personal information that is not derived data for marketing and advertising purposes:

- **Direct marketing.** We may send you direct marketing communications and may personalize these messages based on your needs and interests. You may opt-out of our marketing communications as described in the [Opt-out of marketing](#) section below.
- **Interest-based advertising.** We and our third-party advertising partners may use cookies and other technologies to collect information about your interaction (including the data described in the "[automatic data collection](#)" section above) with the Service, our communications and other online services over time, and use that information to serve online ads that we or they think will interest you. This is called interest-based advertising. We may also share information about our users with these companies to facilitate interest-based advertising to those or similar users on other online platforms. You can learn more about your choices for limiting interest-based advertising in the [Your choices](#) section, below and in our Cookie Notice.

Compliance and protection. We may use your personal information, including derived data, to:

- comply with applicable laws, lawful requests, and legal processes, such as responding to subpoenas, investigations or requests from government authorities;
- protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- audit our internal processes for compliance with legal and contractual requirements or our internal policies;
- enforce the terms and conditions that govern the Service; and
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

Data sharing in the context of corporate events, we may share certain personal information, including derived data, in the context of actual or prospective corporate events – for more information, see "[How we share your personal information](#)", below.

To create aggregated, de-identified and/or anonymized data. We may create aggregated, de-

identified and/or anonymized data from your personal information and other individuals whose personal information we collect. We make personal information into de-identified and/or anonymized data by removing information that makes the data identifiable to you. We may use this aggregated, de-identified and/or anonymized data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business and to train our AI models and for other machine learning purposes. See the [Your choices](#) section, below, for information concerning choices you may have to opt-out of use of your personal information for AI training purposes.

Further uses, in some cases, we may use your personal information for further uses, in which case we will ask for your consent to use your personal information for those further purposes if they are not compatible with the initial purpose for which information was collected.

Retention

We generally retain personal information to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish or defend legal claims, or for fraud prevention purposes. To determine the appropriate retention period for personal information, we may consider factors such as the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

When we no longer require the personal information we have collected about you, we may either delete it, anonymize it, or isolate it from further processing.

How we share your personal information

We may share your personal information, including derived data, with the following parties (or as otherwise described in other applicable notices or at the time of collection):

- **Service providers.** Third parties that provide services on our behalf or help us operate the Service or our business. Service providers include AI providers, including generative AI providers, such as ElevenLabs and Amazon Bedrock. Service providers also may include companies that assist us with hosting, information technology, customer support, email delivery, marketing, consumer research and analytics.
- **Professional advisors.** Professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.
- **Authorities and others.** Law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for the Compliance and protection purposes described above.
- **Business transferees.** We may disclose personal information in the context of actual or prospective business transactions (e.g., investments in Hedra, financing of Hedra, public stock offerings, or the sale, transfer or merger of all or part of our business, assets or shares). For example, we may need to share certain personal information with prospective counterparties and their advisers. We may also disclose your personal information to an acquirer, successor, or assignee of Hedra as part of any merger, acquisition, sale of assets, or similar transaction, and/or in the event of an insolvency, bankruptcy, or receivership in which personal information is transferred to one or more third parties as

one of our business assets.

We may share your personal information that is not derived data with the following parties (or as otherwise described in other applicable notices or at the time of collection):

Payment processors. Any payment card information you use to make a purchase on the Service is collected and processed directly via Apple Pay or our other payment processors, such as Stripe. Our payment processors may use your payment data in accordance with their own privacy policies.

Advertising partners. Third-party advertising companies for the interest-based advertising purposes described above.

Third parties designated by you. We may share your personal information with third parties where you have instructed us or provided your consent to do so.

Partners. Third parties with whom we partner, including parties with whom we co-sponsor events or promotions, with whom we jointly offer products or services, or whose products or services may be of interest to you.

Linked third-party services. If you log into the Service with, or otherwise link your Service account to, a social media or other third-party service, we may share your personal information with that third-party service. The third party's use of the shared information will be governed by its privacy policy and the settings associated with your account with the third-party service.

Other users and the public. Your profile and other user-generated content data may be visible to other users of the Service and the public. For example, other users of the Service or the public may have access to your information if you chose to make your profile or other personal information available to them through the Service, such as when you share or allow others to use an image or a video, participate in a messaging thread or forum, provide comments, reviews, survey responses, or share other content. This information can be seen, collected and used by others, including being cached, copied, screen captured or stored elsewhere by others (e.g., search engines), and we are not responsible for any such use of this information.

Your choices

In this section, we describe the rights and choices available to all users. Users located in a state with a State Privacy Law or in Europe can find additional information about their rights in the State Privacy Rights Notice or Notice to European Users sections, respectively.

Access or update your information. If you have registered for an account with us through the Service, you may review and update certain account information by logging into the account.

Opt-out of communications. You may opt-out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email, or by contacting us. Please note that if you choose to opt-out of marketing-related emails, you may continue to receive service-related and other non-marketing emails.

Training data. As set out in the [How we use your personal information](#) section, we may use your personal information, provided it is aggregated, de-identified and/or anonymized, to train our AI models and for other machine learning purposes. This helps improve the Hedra Platform. If you would like to opt-out of our processing of your

personal information for this purpose, please contact us via email to support@hedra.com.

Cookies and other technologies. For information about cookies and other technologies employed by the Service and how to control them, see our Cookie Notice. Most browsers let you remove or reject cookies. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. Please note that if you set your browser to disable cookies, the Service may not work properly. For more information about cookies, including how to see what cookies have been set on your browser and how to manage and delete them, visit www.allaboutcookies.org. You can also configure your device to prevent images from loading to prevent web beacons from functioning.

Blocking images/clear gifs: Most browsers and devices allow you to configure your device to prevent images from loading. To do this, follow the instructions in your particular browser or device settings.

Advertising choices. You may be able to limit use of your information for interest-based advertising through the following settings/options/tools:

- **Browser settings.** Changing your internet web browser settings to block third-party cookies.
- **Privacy browsers/plug-ins.** Using privacy browsers and/or ad-blocking browser plug-ins that let you block tracking technologies.
- **Platform settings.** Certain platforms offer opt-out features that let you opt-out of the use of your information for interest-based advertising. For example, you may be able to exercise that option for Google and Facebook, respectively, at the following websites:
 - Google: <https://adssettings.google.com/>
 - Facebook: <https://www.facebook.com/about/ads>
- **Ad industry tools.** Opting out of interest-based ads from companies that participate in the following industry opt-out programs:
 - Network Advertising Initiative: http://www.networkadvertising.org/managing/opt_out.asp
 - Digital Advertising Alliance: optout.aboutads.info
 - AppChoices mobile app, available at <https://www.youradchoices.com/appchoices>, which will allow you to opt-out of interest-based ads in mobile apps served by participating members of the Digital Advertising Alliance.
- **Mobile settings.** Using your mobile device settings to limit use of the advertising ID associated with your mobile device for interest-based advertising purposes.

You will need to apply these opt-out settings on each device and browser from which you wish to limit the use of your information for interest-based advertising purposes.

We cannot offer any assurances as to whether the companies we work with participate in the opt-out programs described above.

Do Not Track. Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track” signals. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

Declining to provide information. We need to collect personal information to provide certain services. If you do not provide the information we identify as required or mandatory, we may not be able to provide those services.

Linked third-party platforms. If you choose to connect to the Service through your social media account or other third-party platform, you may be able to use your settings in your account with that platform to limit the information we receive from it. If you revoke our ability to access information from a third-party platform, that choice will not apply to information that we have already received from that third party.

Delete your content or close your account. If you wish to request to close or delete your account, you will need to email us at accounts@hedra.com.

Other sites and services

The Service may contain links to websites, mobile applications, and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites, mobile applications or online services operated by third parties, and we are not responsible for their actions. We encourage you to read the privacy policies of the other websites, mobile applications and online services you use.

Security

We employ technical, organizational and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies and we cannot guarantee the security of your personal information.

International data transfer

We are headquartered in the United States and may use service providers that operate in other countries. Your personal information may be transferred to the United States or other locations where privacy laws may not be as protective as those in your state, province, or country.

Users in Europe should read the important information provided below about transfer of personal information outside of Europe.

Children

The Service is not intended for use by anyone under 18 years of age. If you are a parent or guardian of a child from whom you believe we have collected personal information in a manner prohibited by law, please [contact us](#). If we learn that we have collected personal information through the Service from a child without the consent of the child’s parent or guardian as required by law, we will comply with applicable legal requirements to delete the information.

Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the

Service or other appropriate means. Any modifications to this Privacy Policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). In all cases, your use of the Service after the effective date of any modified Privacy Policy indicates your acknowledging that the modified Privacy Policy applies to your interactions with the Service and our business.

How to contact us

- **Email:** info@hedra.com
- **Mail:**
Hedra Inc.
2261 Market Street
STE 5341
San Francisco, CA 94114
United States
- **Phone:** (415) 267-9846

State privacy rights notice

Except as otherwise provided, this section applies to residents of California, Virginia and other states to the extent they have privacy laws applicable to us that grant their residents the rights described below (collectively, the “**State Privacy Laws**”).

This section describes how we collect, use, and share Personal Information of residents of these states and the rights these users may have with respect to their Personal Information. Please note that not all rights listed below may be afforded to all users and that if you are not a resident of a state with a privacy law applicable to us, you may not be able to exercise these rights. In addition, **we may not be able to process your request if you do not provide us with sufficient detail to allow us to confirm your identity or understand and respond to it.** We will verify you by asking you to send or confirm your request via the email address associated with your account or to provide information related to the account necessary to verify that you are the owner of the account.

For purposes of this section, the term “**Personal Information**” has the meaning given to “personal data”, “personal information” or other similar terms and “Sensitive Personal Information” has the meaning given to “sensitive personal information,” “sensitive data”, or other similar terms in the State Privacy Laws, except that in neither case does such term include information exempted from the scope of the State Privacy Laws. In some cases, we may provide a different privacy notice to certain categories of residents of these states, such as job applicants, in which case that notice will apply instead of this section.

Your privacy rights. The State Privacy Laws may provide residents with some or all of the rights listed below. However, these rights are not absolute and some State Privacy Laws do not provide these rights to their residents. Therefore, we may decline your request in certain cases as permitted by law.

- **Information.** You can request the following information about how we have collected and used your Personal Information:
 - The categories of Personal Information that we have collected.
 - The categories of sources from which we collected Personal Information.

- The business or commercial purpose for collecting and/or selling Personal Information.
- The categories of third parties with which we share Personal Information.
- The categories of Personal Information that we sold or disclosed for a business purpose.
- The categories of third parties to whom the Personal Information was sold or disclosed for a business purpose.
- **Access.** You can request a copy of the Personal Information that we have collected about you.
- **Appeal.** You can appeal our denial of any request validly submitted.
- **Correction.** You can ask us to correct inaccurate Personal Information that we have collected about you.
- **Deletion.** You can ask us to delete the Personal Information that we have collected from you.
- **Opt-out.**
 - **Opt-out of certain processing for targeted advertising purposes.** We may process Personal Information for targeted advertising purposes. You can opt-out of certain processing of personal information for targeted advertising purposes.
 - **Opt-out of profiling/automated decision making.** We do not use your Personal Information to engage in profiling or to perform automated decision-making that results in significant financial impacts, significant impacts on housing, education, employment, health care, or criminal justice, or similarly significant impacts.
 - **Opt-out of other sales of personal data.** You can opt-out of other sales of your Personal Information.
- **Consumers under 16.** We do not have actual knowledge that we collect, sell or share the personal information of consumers under 16 years of age.
- **Sensitive Personal Information.** While we may process certain categories of Sensitive Personal Information as described in this Privacy Policy, we do not process Sensitive Personal Information for the purpose of inferring characteristics about consumers under the CCPA.
- **Nondiscrimination.** You are entitled to exercise the rights described above free from discrimination as prohibited by the State Privacy Laws.

Exercising your right to information/know, access, appeal, correction, and deletion. You may submit requests to exercise your right to information/know, access, appeal, correction, or deletion by calling us toll free at 1-415-267-9846, or via email to support@hedra.com

Exercising your right to opt-out of the “sale” or “sharing” of your Personal Information. While we do not sell personal information for money, like many companies, we use services that help deliver interest-based ads to you as described above. The State Privacy Laws may classify our use of some of these services as “selling” or “sharing” your Personal Information with the advertising partners that provide the services. You can submit requests to opt-out of tracking for targeted advertising purposes or other sales of Personal Information here: via email to support@hedra.com or via phone by calling 1-415-267-9846, or by broadcasting the global privacy control signal.

Verification of Identity; Authorized agents. We may need to verify your identity in order to process your information/know, access, appeal, correction, or deletion requests and reserve the right to confirm your residency. To verify your identity, we may require government identification, a declaration under penalty of perjury, or other information, where permitted by law.

Under some State Privacy Laws, you may enable an authorized agent to make a request on your behalf. However, we may need to verify your authorized agent’s identity and authority to act on your behalf. We may require a copy of a valid power of attorney given to your authorized agent pursuant to applicable law. If you have not provided your agent with such a power of attorney, we may ask you to take additional steps permitted by law to verify that your request is authorized, such as by providing your agent with written and signed permission to exercise your State Privacy Laws rights on your behalf, the information we request to verify your identity, and confirmation that you have given the authorized agent permission to submit the request.

Personal information that we collect, use and disclose. We have summarized the Personal Information we collect, the purposes for which we collect it and the third parties to whom we may disclose it by reference below to both the categories defined in the “Personal information we collect” section of this Policy above and the categories of Personal Information specified in the CCPA (Cal. Civ. Code §1798.140). This chart describes our practices currently and during the 12 months preceding the effective date of this Privacy Policy. Information you voluntarily provide to us, such as in free-form webforms, may contain other categories of personal information not described below.

Personal Information (“PI”) we collect	CCPA statutory category	Purposes	Categories of third parties to whom we “disclose” PI for a business purpose	Categories of third parties to whom we “sell” or “share” PI
<ul style="list-style-type: none"> • <i>Contact data</i> 	<ul style="list-style-type: none"> • <i>Identifiers</i> • <i>Commercial information</i> • <i>California customer records</i> 	<ul style="list-style-type: none"> • <i>Service delivery and operations</i> • <i>Service personalization</i> • <i>Service improvement and analytics</i> • <i>Marketing and advertising</i> • <i>Compliance and protection</i> • <i>Data sharing in the context of corporate events</i> • <i>To create aggregated, de-identified and/or anonymized data</i> 	<ul style="list-style-type: none"> • <i>Affiliates</i> • <i>Service providers</i> • <i>Payment processors</i> • <i>Advertising partners</i> • <i>Third parties designated by you</i> • <i>Professional advisors</i> • <i>Authorities and others</i> • <i>Business transferees</i> • <i>Business and marketing</i> 	<ul style="list-style-type: none"> • <i>Advertising partners (to facilitate online advertising)</i> • <i>Business and marketing partners</i>

		<ul style="list-style-type: none"> • <i>Further uses</i> 	<ul style="list-style-type: none"> <i>partners</i> • <i>Other users and the public</i> 	
<ul style="list-style-type: none"> • <i>Profile data</i> 	<ul style="list-style-type: none"> • <i>Identifiers</i> • <i>Commercial information</i> • <i>California customer records</i> 	<ul style="list-style-type: none"> • <i>Service delivery and operations</i> • <i>Service personalization</i> • <i>Service improvement and analytics</i> • <i>Marketing and advertising</i> • <i>Compliance and protection</i> • <i>Data sharing in the context of corporate events</i> • <i>To create aggregated, de-identified and/or anonymized data</i> • <i>Further uses</i> 	<ul style="list-style-type: none"> • <i>Affiliates</i> • <i>Service providers</i> • <i>Payment processors</i> • <i>Advertising partners</i> • <i>Third parties designated by you</i> • <i>Professional advisors</i> • <i>Authorities and others</i> • <i>Business transferees</i> • <i>Business and marketing partners</i> • <i>Other users and the public</i> 	<ul style="list-style-type: none"> • <i>Advertising partners (to facilitate online advertising)</i> • <i>Business and marketing partners</i>
<ul style="list-style-type: none"> • <i>Communications data</i> 	<ul style="list-style-type: none"> • <i>Identifiers</i> • <i>Commercial information</i> • <i>California consumer records</i> • <i>Internet or Network Information</i> 	<ul style="list-style-type: none"> • <i>Service delivery and operations</i> • <i>Service personalization</i> • <i>Service improvement and analytics</i> • <i>Marketing and advertising</i> • <i>Compliance and protection</i> • <i>Data sharing in the context of corporate events</i> • <i>To create aggregated, de-identified and/or</i> 	<ul style="list-style-type: none"> • <i>Affiliates</i> • <i>Service providers</i> • <i>Payment processors</i> • <i>Advertising partners</i> • <i>Third parties designated by you</i> • <i>Professional advisors</i> • <i>Authorities and others</i> • <i>Business transferees</i> 	<ul style="list-style-type: none"> • <i>Advertising partners (to facilitate online advertising)</i> • <i>Business and marketing partners</i>

		<ul style="list-style-type: none"> <i>anonymized data</i> <i>Further uses</i> 	<ul style="list-style-type: none"> <i>Business and marketing partners</i> <i>Other users and the public</i> 	
<ul style="list-style-type: none"> <i>Transactional and payment data</i> 	<ul style="list-style-type: none"> <i>Commercial information</i> <i>California consumer records</i> <i>Financial information</i> 	<ul style="list-style-type: none"> <i>Service delivery and operations</i> <i>Service personalization</i> <i>Service improvement and analytics</i> <i>Marketing and advertising</i> <i>Compliance and protection</i> <i>Data sharing in the context of corporate events</i> <i>To create aggregated, de-identified and/or anonymized data</i> <i>Further uses</i> 	<ul style="list-style-type: none"> <i>Affiliates</i> <i>Service providers</i> <i>Payment processors</i> <i>Advertising partners</i> <i>Third parties designated by you</i> <i>Professional advisors</i> <i>Authorities and others</i> <i>Business transferees</i> <i>Business and marketing partners</i> <i>Other users and the public</i> 	<ul style="list-style-type: none"> <i>Advertising partners (to facilitate online advertising)</i> <i>Business and marketing partners</i>
<ul style="list-style-type: none"> <i>Marketing data</i> 	<ul style="list-style-type: none"> <i>Identifiers</i> <i>Commercial information</i> <i>California customer records</i> <i>Internet or Network Information</i> 	<ul style="list-style-type: none"> <i>Service delivery and operations</i> <i>Service personalization</i> <i>Service improvement and analytics</i> <i>Marketing and advertising</i> <i>Compliance and protection</i> <i>Data sharing in the context of corporate events</i> <i>To create</i> 	<ul style="list-style-type: none"> <i>Affiliates</i> <i>Payment processors</i> <i>Professional advisors</i> <i>Authorities and others</i> <i>Business transferees</i> 	<ul style="list-style-type: none"> <i>Advertising partners (to facilitate online advertising)</i> <i>Business and marketing partners</i>

		<p><i>aggregated, de-identified and/or anonymized data</i></p> <ul style="list-style-type: none"> • <i>Further uses</i> 		
<ul style="list-style-type: none"> • <i>User-generated content</i> 	<ul style="list-style-type: none"> • <i>Sensory Information</i> • <i>California consumer records</i> 	<ul style="list-style-type: none"> • <i>Service delivery and operations</i> • <i>Service personalization</i> • <i>Service improvement and analytics</i> • <i>Marketing and advertising</i> • <i>Compliance and protection</i> • <i>Data sharing in the context of corporate events</i> • <i>To create aggregated, de-identified and/or anonymized data</i> • <i>Further uses</i> 	<ul style="list-style-type: none"> • <i>Affiliates</i> • <i>Service providers</i> • <i>Advertising partners</i> • <i>Third parties designated by you</i> • <i>Professional advisors</i> • <i>Authorities and others</i> • <i>Business transferees</i> • <i>Business and marketing partners</i> • <i>Other users and the public</i> 	<ul style="list-style-type: none"> • <i>None</i>
<ul style="list-style-type: none"> • <i>Derived data</i> 	<ul style="list-style-type: none"> • <i>Sensory Information</i> • <i>Biometric Information</i> • <i>California customer records</i> 	<ul style="list-style-type: none"> • <i>Service delivery and operations</i> • <i>Compliance and protection</i> • <i>Data sharing in the context of corporate events</i> • <i>To create aggregated, de-identified and/or anonymized data</i> • <i>Further uses</i> 	<ul style="list-style-type: none"> • <i>Affiliates</i> • <i>Service providers</i> • <i>Advertising partners</i> • <i>Third parties designated by you</i> • <i>Professional advisors</i> • <i>Authorities and others</i> • <i>Business transferees</i> • <i>Business and marketing partners</i> 	<p><i>None</i></p>

			<ul style="list-style-type: none"> • Other users and the public 	
<ul style="list-style-type: none"> • Device data 	<ul style="list-style-type: none"> • Identifiers • Internet or Network Information 	<ul style="list-style-type: none"> • Service delivery and operations • Service personalization • Service improvement and analytics • Marketing and advertising • Compliance and protection • Data sharing in the context of corporate events • To create aggregated, de-identified and/or anonymized data • Further uses 	<ul style="list-style-type: none"> • Affiliates • Service providers • Payment processors • Advertising partners • Third parties designated by you • Professional advisors • Authorities and others • Business transferees • Business and marketing partners • Other users and the public 	<ul style="list-style-type: none"> • Advertising partners (to facilitate online advertising) • Business and marketing partners
<ul style="list-style-type: none"> • Online activity data 	<ul style="list-style-type: none"> • Identifiers • Commercial information • Internet or Network Information 	<ul style="list-style-type: none"> • Service delivery and operations • Service personalization • Service improvement and analytics • Marketing and advertising • Compliance and protection • Data sharing in the context of corporate events • To create aggregated, de-identified and/or anonymized data 	<ul style="list-style-type: none"> • Affiliates • Service providers • Payment processors • Advertising partners • Third parties designated by you • Professional advisors • Authorities and others • Business transferees • Business and 	<ul style="list-style-type: none"> • Advertising partners (to facilitate online advertising) • Business and marketing partners

		<ul style="list-style-type: none"> • <i>Further uses</i> 	<ul style="list-style-type: none"> • <i>marketing partners</i> • <i>Other users and the public</i> 	
<ul style="list-style-type: none"> • <i>Geolocation data</i> 	<ul style="list-style-type: none"> • <i>Geolocation data</i> 	<ul style="list-style-type: none"> • <i>Service delivery and operations</i> • <i>Service personalization</i> • <i>Service improvement and analytics</i> • <i>Marketing and advertising</i> • <i>Compliance and protection</i> • <i>Data sharing in the context of corporate events</i> • <i>To create aggregated, de-identified and/or anonymized data</i> • <i>Further uses</i> 	<ul style="list-style-type: none"> • <i>Affiliates</i> • <i>Service providers</i> • <i>Advertising partners</i> • <i>Third parties designated by you</i> • <i>Professional advisors</i> • <i>Authorities and others</i> • <i>Business transferees</i> • <i>Business and marketing partners</i> • <i>Other users and the public</i> 	None
<ul style="list-style-type: none"> • <i>Communication interaction data</i> 	<ul style="list-style-type: none"> • <i>Identifiers</i> • <i>Commercial information</i> • <i>California consumer records</i> • <i>Internet or Network Information</i> 	<ul style="list-style-type: none"> • <i>Service delivery and operations</i> • <i>Service personalization</i> • <i>Service improvement and analytics</i> • <i>Marketing and advertising</i> • <i>Compliance and protection</i> • <i>Data sharing in the context of corporate events</i> • <i>To create aggregated, de-identified and/or anonymized data</i> 	<ul style="list-style-type: none"> • <i>Affiliates</i> • <i>Service providers</i> • <i>Payment processors</i> • <i>Advertising partners</i> • <i>Third parties designated by you</i> • <i>Professional advisors</i> • <i>Authorities and others</i> • <i>Business transferees</i> • <i>Business and</i> 	<ul style="list-style-type: none"> • <i>Advertising partners (to facilitate online advertising)</i> • <i>Business and marketing partners</i>

		<ul style="list-style-type: none"> • <i>Further uses</i> 	<ul style="list-style-type: none"> • <i>marketing partners</i> • <i>Other users and the public</i> 	
<ul style="list-style-type: none"> • <i>Data derived from the above</i> 	<ul style="list-style-type: none"> • <i>Inferences</i> 	<ul style="list-style-type: none"> • <i>Service delivery and operations</i> • <i>Service personalization</i> • <i>Service improvement and analytics</i> • <i>Marketing and advertising</i> • <i>Compliance and protection</i> • <i>Data sharing in the context of corporate events</i> • <i>To create aggregated, de-identified and/or anonymized data</i> • <i>Further uses</i> 	<ul style="list-style-type: none"> • <i>Affiliates</i> • <i>Service providers</i> • <i>Advertising partners</i> • <i>Professional advisors</i> • <i>Authorities and others</i> • <i>Business transferees</i> • <i>Business and marketing partners</i> 	<ul style="list-style-type: none"> • <i>Advertising partners (to facilitate online advertising)</i> • <i>Business and marketing partners</i>
<ul style="list-style-type: none"> • <i>Other Sensitive Personal Information</i> <p><i>We do not intentionally collect this information, but it may be revealed in other information we collect</i></p>	<ul style="list-style-type: none"> • <i>Protected Classification Characteristics</i> 	<ul style="list-style-type: none"> • <i>Service delivery and operations</i> • <i>Compliance and protection</i> • <i>Data sharing in the context of corporate events</i> • <i>To create aggregated, de-identified and/or anonymized data</i> • <i>Further uses</i> 	<ul style="list-style-type: none"> • <i>N/A</i> 	<ul style="list-style-type: none"> • <i>None</i>

Additional information for California residents - Shine the light law. Under California’s Shine the Light law (California Civil Code Section 1798.83), California residents may ask companies with whom they have formed a business relationship primarily for personal, family or household purposes to provide the names of third parties to which they have disclosed certain personal information (as defined under the Shine the Light law) during the preceding calendar year for their own direct

marketing purposes, and the categories of personal information disclosed. You may send us requests for this information to accounts@hedra.com. In your request, you must include the statement "Shine the Light Request," and provide your first and last name and mailing address and certify that you are a California resident. We reserve the right to require additional information to confirm your identity and California residency. Please note that we will not accept requests via telephone, mail, or facsimile, and we are not responsible for notices that are not labeled or sent properly, or that do not have complete information.

Additional information for Nevada residents. Nevada residents have the right to opt-out of the sale of certain personal information for monetary consideration. While we do not currently engage in such sales, if you are a Nevada resident and would like to make a request to opt out of any potential future sales, please email support@hedra.com.

Contact Us. If you have questions or concerns about our privacy policies or information practices, please contact us using the contact details set forth in the [How to contact us](#) section, above.

Notice to European Users

General

Where this Notice to European users applies. The information provided in this ‘Notice to European Users’ section applies only to individuals located in the European Economic Area (EEA) or United Kingdom (UK) (i.e., “**Europe**” as defined at the top of this Privacy Policy).

Personal information. References to “personal information” in this Privacy Policy should be understood to include a reference to “personal data” as defined in the “**GDPR**” (i.e., the General Data Protection Regulation 2016/679 (“**EU GDPR**”)) and the EU GDPR as it forms part of the laws of the United Kingdom (“**UK GDPR**”). Under the GDPR, “personal data” means information about individuals from which they are either directly identified or can be identified. The personal information that we collect from and about you is described in greater detail in the section “Personal information we collect”.

Controller. Hedra is the “controller” in respect of the processing of your personal information covered by this Privacy Policy for purposes of the GDPR. See the ‘How to contact us’ section above for our contact details.

Our GDPR Representatives. We have appointed the following representatives in Europe as required by the GDPR – you can contact them directly should you wish:

Our Representative in the EU. Our EU representative appointed under the EU GDPR is DataRep. You can contact them:

- By email: datarequest@datarep.com.
- By postal mail: DataRep, The Cube, Monahan Road, Cork, T12 H1XY, Republic of Ireland

Our Representative in the UK. Our UK representative appointed under the UK GDPR is DataRep. You can contact them:

- By email: datarequest@datarep.com.
- By postal mail: DataRep, 107-111 Fleet Street, London, EC4A 2AB, United Kingdom

Our legal bases for processing

In respect of each of the purposes for which we use your personal information, the GDPR requires us to ensure that we have a “legal basis” for that use.

Our legal bases for processing your personal information described in this Privacy Policy are listed below.

- Where we need to process your personal information in order to deliver the Service to you, or where you have asked us to take specific action which requires us to process your personal information (“**Contractual Necessity**”).
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests (“**Legitimate Interests**”). More detail about the specific legitimate interests pursued in respect of each Purpose we use your personal information

for is set out in the table below.

- Where we need to comply with a legal or regulatory obligation (“**Compliance with Law**”).
- Where we have your specific consent to carry out the processing for the Purpose in question (“**Consent**”).

We have set out below, in a table format, the legal bases we rely on in respect of the relevant Purposes for which we use your personal information – for more information on these Purposes and the data types involved, see the ‘How we use your personal information’ section above and the description of associated data sharing relevant to such purposes set out in the ‘How we share your personal information’ section also above.

Purpose	Categories of personal information involved	Legal basis
Service delivery and operations	<ul style="list-style-type: none"> • Contact data • Profile data • Communications data • Transactional and payment data • User-generated content data • Derived data • Data from Third Party Services • Device data • Geolocation data 	<p><u>Delivery and operations</u></p> <ul style="list-style-type: none"> • Contractual Necessity. • Legitimate Interests. We have a legitimate interest in ensuring the ongoing security and proper operation of our Service, our business and associated IT services, systems and networks. <p><u>Personalization</u></p> <ul style="list-style-type: none"> • Legitimate Interests. We have a legitimate interest in providing you with a good service via the Service, which is personalized to you and that remembers your selections and preferences. • Consent, in respect of any optional processing relevant to personalization (including processing directly associated with any optional cookies used for this purpose).
Service improvement and analytics	<ul style="list-style-type: none"> • Contact data • Profile data • Communications data • Transactional and payment data • Marketing data 	<ul style="list-style-type: none"> • Legitimate Interests. We have legitimate interest in researching users’ use of our Service and developing our Service accordingly, including through the use of artificial intelligence technologies.

Purpose	Categories of personal information involved	Legal basis
	<ul style="list-style-type: none"> • User-generated content data • Device data • Online activity data • Geolocation data • Communication interaction data 	
Direct marketing	<ul style="list-style-type: none"> • Contact data • Profile data • Transactional and payment data • Marketing data 	<ul style="list-style-type: none"> • Legitimate Interests. We have a legitimate interest in promoting our operations and goals as an organization and sending marketing communications for that purpose. • Consent, in circumstances or in jurisdictions where consent is required under applicable data protection laws to the sending of any given marketing communications.
Interest-based advertising	<ul style="list-style-type: none"> • Contact data • Profile data • Transactional and payment data • Marketing data • Device data • Online activity data • Geolocation data • Location data 	<ul style="list-style-type: none"> • Consent
Compliance and protection	Any and all data types relevant in the circumstances	<ul style="list-style-type: none"> • Compliance with Law. • Legitimate Interests. Where Compliance with Law is not applicable, we and any relevant third parties have a legitimate interest in participating in, supporting, and following legal process and requests, including through co-operation with authorities. We and any relevant third parties may also have a legitimate interest of ensuring the protection, maintenance, and enforcement of our and their rights, property, and/or safety.
Data sharing in the context of corporate	Any and all data types relevant in the circumstances	<ul style="list-style-type: none"> • Legitimate Interests. We have a legitimate interest in providing information to relevant third parties who are involved in an actual or

Purpose	Categories of personal information involved	Legal basis
events		prospective corporate event (including to enable them to investigate – and, where relevant, to continue to operate – all or relevant part(s) of our operations). However, we always look to take steps to minimize the amount and sensitivity of any personal information shared in these contexts where possible and appropriate.
To create aggregated, de-identified and/or anonymized data	Any and all data types relevant in the circumstances	<ul style="list-style-type: none"> <li data-bbox="773 617 1416 772">• Legitimate Interests. We have a legitimate interest in creating aggregated, de-identified and/or anonymized data in order to preserve our users’ privacy.
Further uses	Any and all data types relevant in the circumstances	<ul style="list-style-type: none"> <li data-bbox="773 848 1416 1003">• The original legal basis relied upon, if the relevant further use is compatible with the initial purpose for which the personal information was collected. <li data-bbox="773 1045 1416 1165">• Consent, if the relevant further use is not compatible with the initial purpose for which the personal information was collected.

Retention

We retain personal information for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish or defend legal claims, or for the ‘Compliance and protection’ purposes outlined above.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

When we no longer require the personal information that we have collected about you, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible. If we anonymize your personal information (so that it can no longer be associated with you), we may use this

information indefinitely without further notice to you.

Other information

No obligation to provide personal information. You do not have to provide personal information to us. However, where we *need* to process your personal information either to comply with applicable law or to deliver our Service to you, and you fail to provide that personal information when requested, we may not be able to provide some or all of our Service to you. We will notify you if this is the case at the time.

No sensitive information. We ask that you not provide us with any sensitive personal information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, criminal background or trade union membership, or biometric or genetics characteristic other than as requested by us as part of the Service) on or through the Service, or otherwise to us. If you provide us with any such sensitive personal information to us when you use the Service, you must consent to our processing and use of such sensitive personal information in accordance with this Privacy Policy. If you do not consent to our processing and use of such sensitive personal information, you must not submit such sensitive personal information through our Service.

No automated decision-making and profiling. As part of the Service, we do not engage in automated decision-making and/or profiling, which produces legal or similarly significant effects. We provide our analysis to our business customers and our business customers make decisions that may affect you.

Security. We have put in place procedures designed to deal with breaches of personal information. In the event of such breaches, we have procedures in place to work with applicable regulators. In addition, in certain circumstances (including where we are legally required to do so), we may notify you of breaches affecting your personal information.

Your additional rights

General. European data protection laws may give you certain rights regarding your personal information in certain circumstances. If you are located in Europe, you may ask us to take the following actions in relation to your personal information that we hold:

- **Access.** Provide you with information about our processing of your personal information and give you access to your personal information.
- **Correct.** Update or correct inaccuracies in your personal information.
- **Delete.** Delete your personal information where there is no good reason for us continuing to process it - you also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Transfer.** Transfer to you or a third party of your choice a machine-readable copy of your personal information which you have provided to us.

- **Restrict.** Restrict the processing of your personal information, for example if you want us to establish its accuracy or the reason for processing it.
- **Object.** Object to our processing of your personal information where we are relying on Legitimate Interests – you also have the right to object where we are processing your personal information for direct marketing purposes.
- **Withdraw Consent.** When we use your personal information based on your consent, you have the right to withdraw that consent at any time.

Exercising These Rights. You may submit these requests by contacting us. We may request specific information from you to help us confirm your identity and process your request. Whether or not we are required to fulfill any request you make will depend on a number of factors (e.g., why and how we are processing your personal information), if we reject any request you may make (whether in whole or in part) we will let you know our grounds for doing so at the time, subject to any legal restrictions. Typically, you will not have to pay a fee to exercise your rights; however, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. We try to respond to all legitimate requests within a month of receipt. It may take us longer than a month if your request is particularly complex or if you have made a number of requests; in this case, we will notify you and keep you updated.

Your Right to Lodge a Complaint with your Supervisory Authority. Although we urge you to contact us first to find a solution for any concern you may have, in addition to your rights outlined above, if you are not satisfied with our response to a request you make, or how we process your personal information, you can make a complaint to the data protection regulator in your habitual place of residence.

- *For users in the European Economic Area* – the contact information for the data protection regulator in your place of residence can be found here: https://edpb.europa.eu/about-edpb/board/members_en
- *For users in the UK* – the contact information for the UK data protection regulator can be found here: <https://ico.org.uk/make-a-complaint/>

Data Processing outside Europe

We are a U.S.-based company and many of our service providers, advisers, partners or other recipients of data are also based in the U.S. This means that, if you use the Service, your personal information will necessarily be accessed and processed in the U.S. It may also be provided to recipients in other countries outside Europe.

Where we share your personal information with third parties who are based outside Europe, we try to ensure a similar degree of protection is afforded to it by making sure one of the following mechanisms is implemented:

- **Transfers to territories with an adequacy decision.** We may transfer your personal information to countries or territories whose laws have been deemed to provide an

adequate level of protection for personal information by the European Commission or UK Government (as and where applicable) (from time to time) or under specific adequacy frameworks approved by the European Commission or UK Government (as and where applicable) (from time to time), such as the EU-U.S. Data Privacy Framework or the UK Extension thereto.

- **Transfers to territories without an adequacy decision.**

- We may transfer your personal information to countries or territories whose laws have **not** been deemed to provide such an adequate level of protection (e.g., the U.S.).
- However, in these cases:
 - we may use specific appropriate safeguards, which are designed to give personal information effectively the same protection it has in Europe – for example, standard-form contracts approved by relevant authorities for this purpose; or
 - in limited circumstances, we may rely on an exception, or ‘derogation’, which permits us to transfer your personal information to such country despite the absence of an ‘adequacy decision’ or ‘appropriate safeguards’ – for example, reliance on your explicit consent to that transfer.

You may [contact us](#) if you want further information on the specific mechanism used by us when transferring your personal information out of Europe.