

PRIVACY POLICY

BluePond.AI, Inc. (“BluePond.AI”) provides this Privacy Policy to inform you know about our policies and procedures regarding the collection, use and disclosure of information through www.bluepond.ai (the “Site”) and, and any other websites, features, applications, widgets, products or online services that are owned or controlled by BluePond.AI and that post a link to this Privacy Policy (together with the Site, the “Site Services”), as well as any information BluePond.AI collects in connection with the Site and Site Services (together referred to as “Service”). It also describes the choices available to you regarding the use of, your access to, and how to update and correct your personal information.

Please note that certain features or services referenced in this Privacy Policy may not be offered on the Service at all times. Please also review our Terms of Use, which governs your use of the Service.

1. INFORMATION COLLECTION

By using the Service, you agree to provide us the following information:

- 1.1 **Personal Information:** In the course of using the Service, we may require or otherwise collect information that identifies you as a specific individual and can be used to contact or identify you (“Personal Information”). Examples of Personal Information include your name, email address, company address, billing address, and phone number.
- 1.2 **Payment Information:** If you use the Service to make payments, we will also collect certain payment information, such as billing address, credit information and payment card details, bank account details, along with any other information which may be needed to process the payment. For more details kindly refer to the **Payment Policy**.
- 1.3 **Biometric Identifiers or Service Interaction Information:** We may also collect Personal Information such as a photograph of your face, a selfie, or data about your interactions with the Site and Site Service to verify your identity and to detect fraud, identity theft, or other misuse of your account through the use of facial recognition and other technologies. We may request Government Issued Documents to verify this information. From time to time, BluePond.AI may require you to take and submit an additional or updated image of your face for comparison to your Government Issued Documents. The biometric identifiers or information collected are used only for identity verification and platform security and use integrity purposes.
- 1.4 **Non-Identifying Information/Usernames:** We also may collect other information, such as zip codes, demographic data, information regarding your use of the Service, and general data provided by you (“Non-Identifying Information”). In some cases, we may render Personal Information (generally, email address) into a form of Non-Identifying Information referred to in this Privacy Policy as “Hashed Information.” This is typically accomplished using a

mathematical process (commonly known as a hash function) to convert information into a code. The code does not identify you directly, but it may be used to connect your activity and interests.

1.5 Combination of Personal and Non-Identifying Information: Certain Non-Identifying Information would be considered a part of your Personal Information if it were combined with other identifiers in a way that enables you to be identified (for example, combining information with your name). But the same pieces of information are considered Non-Identifying Information when they are taken alone or combined only with other non-identifying information (for example, your viewing preferences). We may combine your Personal Information with Non-Identifying Information, but BluePond.AI will treat the combined information as Personal Information.

You do not have a statutory obligation to provide us with any information, but you may have a contractual obligation to do so, and if we do not receive certain information from you, then we will not be able to provide our Service to you. If you have any questions regarding whether provision of information is mandatory and the consequences for withholding such information, please contact us using the contact information below.

1.6 Information Received from Third Parties: We also may receive information about you from third parties. For example, we may supplement the information we collect with outside records or third parties may provide information in connection with a co-marketing agreement or at your request (such as if you choose to sign in with a third-party service). If we combine the information we receive from others with information we collect through the Service, we will treat the combined information as described in this Privacy Policy.

1.7 Information Collected Automatically: We and our third-party service providers, including analytics and third-party content providers, may automatically collect certain information from you whenever you access or interact with the Service. This information may include, among other information, the browser and operating system you are using, the URL or advertisement that referred you to the Service, the search terms you entered into a search engine that led you to the Service, areas within the Service that you visited, which links you clicked on, which pages or content you viewed and for how long, other similar information and statistics about your interactions, such as content response times, download errors and length of visits to certain pages and other information commonly shared when browsers communicate with websites. We may combine this automatically collected log information with other information we collect about you. We do this to improve services we offer you, and to improve marketing, analytics, and site functionality.

The information we collect also includes the Internet Protocol (“IP”) address or other unique device identifier (“Device Identifier”) for any device

(computer, mobile phone, tablet, etc.) used to access the Service. A Device Identifier is a number that is automatically assigned or connected to the device you use to access the Service, and our servers identify your device by its Device Identifier. Some mobile service providers may also provide us or our third party service providers with information regarding the physical location of the device used to access the Service.

1.8 BluePond.AI and its partners use cookies or similar technologies to analyze trends, administer the website, track users' movement around the website, the desktop app, and the mobile app, and to gather demographic information about our user base as a whole. The technology used to collect information automatically from BluePond.AI Users may include the following

- (a) **Cookies:** Like many websites, we and our marketing partners, affiliates, analytics, and service providers use “cookies” to collect information. A cookie is a small data file that we transfer to your computer’s hard disk for record-keeping purposes. We use both persistent cookies that remain on your computer or similar device (such as to save your registration ID and login password for future logins to the Service and to track your compliance with the BluePond.AI Terms of Service) and session ID cookies, which expire at the end of your browser session (for example, to enable certain features of the Service, to better understand how BluePond.AI Users interact with the Service and to monitor aggregate usage by BluePond.AI Users and web traffic routing on the Service). You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functionality of the Service. For further information on cookies and how they are used for the Service, please visit our Cookie Policy.
- (b) **Web Beacons:** We and our marketing partners, affiliates, analytics, and service providers may also employ software technology known as “web beacons” and/or “tracking tags” to help us keep track of what content on our Service is effective and to serve relevant advertising to you. Web beacons are small graphics with a unique identifier that may be invisible to you, and which are used to track the online activity of Internet users. Web beacons are embedded in the web pages you review or email messages you receive. Web beacons or similar technologies may be used for a number of purposes, including, without limitation, to count visitors to our Service, to monitor how BluePond.AI Users navigate the Service, to count how many emails that were sent were actually opened, or to count how many particular articles or links were actually viewed.
- (c) **Embedded Scripts:** We and our marketing partners, affiliates, analytics, and service providers may also employ software technology known as

an Embedded Script. An Embedded Script is programming code that is designed to collect information about your interactions with the Service, such as the links you click on. The code is temporarily downloaded onto your computer or other device and is deactivated or deleted when you disconnect from the Service.

In addition, we and our marketing partners, affiliates, analytics, and service providers may use a variety of other technologies (such as tags) that collect similar information for security and fraud detection purposes and we may use third parties to perform these services on our behalf.

2. HOW WE RESPOND TO DO NOT TRACK SIGNALS

Please note that your browser setting may allow you to automatically transmit a “Do Not Track” signal to websites and online services you visit. There is no consensus among industry participants as to what “Do Not Track” means in this context. Like many websites and online services, BluePond.AI does not alter its practices when it receives a “Do Not Track” signal from a visitor’s browser. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>

3. SOCIAL NETWORKING SERVICES

You may register to join the Service directly via the Site or by logging into your account with a third-party social networking service (“SNS”) via our Service. If you choose to register via an SNS, or to later link your account with the Service to your account with an SNS, we will use the Personal Information you have provided to the SNS (such as your name, email address, gender and other information you make publicly available via the SNS) to create your account. Note that the information we collect from and through an SNS may depend on the privacy settings you have set with the SNS and the permissions you grant to us in connection with linking your account with the Service to your account with an SNS. Other than what we may share with the SNS as described below, the Personal Information an SNS has about you is obtained by the SNS independent of our Service, and BluePond.AI is not responsible for it.

BluePond.AI Service also may permit additional interactions between it and a third-party website, service, or other content provider. If you choose to share content or to otherwise share information from or via our Service with a third-party site or service, that information may be publicly displayed, and the third party may have access to information about you and your use of our Service (and we may have access to information about you from that third party). These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. Your interactions with third parties through an SNS or similar features are governed by the respective privacy policies of those third parties.

You represent that you are entitled to use your SNS account for the purposes described herein without breach by you of any of the terms and conditions that govern the SNS, and without obligating BluePond.AI to pay any fees or making BluePond.AI subject to any usage limitations imposed by such SNS. Please note that your relationship with any SNS is governed solely by your agreement(s) with such SNS. If your SNS account terminates, then functions enabled through the link between your BluePond.AI account and your SNS account will terminate as well.

4. USE OF INFORMATION

4.1 The information collected is used

- (a) To provide and improve the Service, complete your transactions, address your inquiries, process your registration, verify the information you provide is valid, and for compliance and internal business purposes.
- (b) To contact you with administrative and commercial communications, newsletters, marketing or promotional materials and other information that may be of interest to you on your email address and phone number. We may send you promotional emails regarding our products and services. If at any time you want to opt-out of receiving promotional emails regarding our products and services, please contact [●] or click the “Unsubscribe” link in any email received from us. When contacting us, please provide your email address so we handle your request correctly. Regardless of your decision to opt-out of future email communications, we may still contact you to respond to an inquiry regarding transactions and for transactional purposes related to your account. We do not sell, lease, or rent our email lists to third parties.
- (c) To personalise content we display to you and offers we may present to you, both on the Service and elsewhere online.
- (d) To administer and develop our business relationship with you and, if applicable, the corporate or other legal entity you represent.
- (e) To enforce and comply with the law, including to conduct an investigation, to protect the property and rights of BluePond.AI or a third party, to protect the safety of the public or any person, or to prevent or stop activity we may consider to be, or to pose a risk of being, illegal, fraudulent, unethical or legally actionable.
- (f) For the purposes disclosed at the time you provide your information, with your consent, and as further described in this Privacy Policy.

4.2 We use your Personal Information for the purposes described above:

- (a) To Honor Our Contractual Commitments to You. Much of our processing of Personal Information is to meet our contractual obligations to our Users, or to take steps at Users' request in anticipation of entering into a contract with them.
- (b) For Our Legitimate Interests. In many cases, we handle Personal Information on the grounds that it furthers our legitimate interests in commercial activities, such as the following, in ways that are not overridden by the interests or rights and freedoms of the affected individuals:

Providing our Site and Service for.

- i) Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity.

- ii) Measuring interest and engagement in our Services.
 - iii) Short-term, transient use, such as contextual customization of ads
 - iv) Improving, upgrading or enhancing our Services.
 - v) Developing new products and services.
 - vi) Ensuring internal quality control and safety.
 - vii) Authenticating and verifying individual identities.
 - viii) Debugging to identify and repair errors with our Services.
 - ix) Auditing relating to interactions, transactions and other compliance activities.
 - x) Enforcing our agreements and policies.
 - xi) Analyzing and improving our business.
 - xii) Communications, including marketing and responding to your inquiries about our services.
 - xiii) Addressing information security needs and protecting our Users, BluePond.AI, and others.
 - xiv) Managing legal issues.
- (c) To Comply with Legal Obligations. We need to use and disclose Personal Information in certain ways to comply with our legal obligations.

5. DATA RETENTION

Unless you request that we delete certain information (see **Your Choices and Rights** below), we will retain your Personal Information for as long as may be necessary to provide our Service to you. Your information may persist in copies made for backup and business continuity purposes. If you choose to provide us with Personal Information, we encourage you to routinely update the data to ensure that we have accurate and up-to-date information about you.

6. INFORMATION SHARING AND DISCLOSURE

We may share aggregated Non-Identifying Information and we may otherwise disclose Non-Identifying Information (including, without limitation, Hashed Information) to third parties. We may also share the information we have collected about you, including Personal Information, as disclosed at the time you provide your information, with your consent, as otherwise described in this Privacy Policy, or in the following circumstances:

- 6.1 **Service Providers:** We may employ third party companies and individuals to facilitate our Service, to provide the Service on our behalf, to perform Service-related services (e.g., without limitation, maintenance services, database management, web analytics and online advertising, payment processing, fraud detection and improvement of BluePond.AI's features) or to assist us in analyzing how our Service is used. These third parties may have access to your Personal Information in order to perform these tasks on our behalf.
- 6.2 **What Happens If You Agree to Receive Information from Third Parties or Request that We Share Your Information:** You may be presented with an

opportunity to receive information and/or marketing offers from one or more third parties. If you agree at that time to have your Personal Information shared, your Personal Information will be disclosed to that third party (or parties) and will be subject to the privacy policy and practices of that third party. We are not responsible for the privacy policies and practices of third parties, and, if you later decide that you no longer want to receive communications from a third party, you will need to contact that third party directly. You also may request, sometimes through your use of an SNS or similar interactive feature or third party application, that we share information about you with a third party and we will typically do so under those circumstances.

- 6.3 **Legal and Investigative Purposes:** BluePond.AI will share information with government agencies as required by law in response to lawful requests by public authorities, including to meet national security or law enforcement requirements and, including without limitation, in connection with reporting earnings. We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We will disclose information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process, or, at the request of governmental authorities or other third parties conducting an investigation where we determine in our sole discretion the disclosure is necessary to (a) protect the property and rights of BluePond.AI or a third party, (b) protect the safety of the public or any person, or (c) prevent or stop activity we may consider to be, or pose a risk of being, illegal, fraudulent, unethical or legally actionable.
- 6.4 **Internal and Business Transfers:** BluePond.AI may share information, including Personal Information, with its current or future subsidiaries or affiliates, primarily for business and operational purposes, including activities such as IT management, for them to provide services to you, or support and supplement the Services we provide. We may sell, transfer, or otherwise share some or all of our assets, including your Personal Information, in connection with a merger, acquisition, reorganization or sale of assets (including, in each case, as part of the due-diligence process with any potential acquiring entity) or in the event of bankruptcy.
- 6.5 **Contests and Promotions:** We may offer contests, and other promotions (any, a “Promotion”) that may require registration. By participating in a Promotion, you are agreeing to the official rules that govern that Promotion, which may contain specific requirements of you, including, except where prohibited by law, allowing the sponsor(s) of the Promotion to use your name, voice, likeness, or other indicia of persona in advertising or marketing associated with the Promotion. If you choose to enter a Promotion, your Personal Information may be disclosed to third parties or the public in connection with the administration of such Promotion, including, without limitation, in connection

with winner selection, prize fulfilment, and as required by law or permitted by the Promotion's official rules, such as on a winner's list.

7. THIRD PARTY ANALYTICS PROVIDERS, AD SERVERS AND SIMILAR THIRD PARTIES

BluePond.AI works with (or may in the future work with) network advertisers, advertisement agencies, analytics service providers and other vendors to provide us with information regarding traffic on the Service, including pages viewed and the actions taken when visiting the Service; to serve our advertisements on other websites, within mobile apps and elsewhere online; and to provide us with information regarding the use of the Service and the effectiveness of our advertisements. Our service providers may collect certain information about your visits to and activity on the Service as well as other websites or services, they may set and access their own tracking technologies on your device and may use that information to show you targeted advertisements. Some of these parties may collect Personal Information when you visit the Service or other online websites and services. We may also share certain Non-Identifying Information with these parties, including Hashed Information, in connection with the services they provide to us. If you wish to opt out of interest-based advertising, [click here](#). If you choose to opt out, please note you will continue to receive generic ads.

8. YOUR CHOICES AND RIGHTS

8.1 Communication Preferences

- (a) BluePond.AI Users may update their choices regarding the types of communications you receive from us through your online account.
- (b) You may opt-out of receiving marketing emails from us by following the opt-out instructions provided in those emails. Please note that we reserve the right to send you certain communications relating to your account or use of the Service (for example, administrative and service announcements) via email and other means and these transactional account messages may be unaffected if you opt-out from receiving marketing communications.

8.2 Data Subject Rights

In accordance with applicable law, you may have the right to:

- (a) **Access Personal Information** about you, including: (i) confirming whether we are processing your personal information; (ii) obtaining access to or a copy of your personal information.
- (b) **Request Correction** of your personal information where it is inaccurate, incomplete or outdated. In some cases, you can update your personal information within your BluePond.AI account by logging in and visiting settings/user settings.
- (c) **Request Deletion, Anonymization or Blocking** of your personal information when processing is based on your consent or when processing is unnecessary, excessive or noncompliant. Note that if your

information is deleted, then your account may become deactivated. If your account is deactivated or you ask to close your account, you will no longer be able to use the Service. If you would like to close your account in our system, you can do so through the BluePond.AI Service.

- (d) **Request Restriction of or Object to** our processing of your personal information when processing is noncompliant.
- (e) **Withdraw your Consent** to our processing of your personal information. If you refrain from providing personal information or withdraw your consent to processing, some features of our Service may not be available.
- (f) **Be informed** about third parties with which your personal information has been shared.
- (g) **Request the review of decisions** taken exclusively based on automated processing if that could affect data subject rights.

We will use commercially reasonable efforts to honor your requests for deletion; however, certain information will actively persist on the Service even if you close your account. In addition, the rights described above may be limited, for example, if fulfilling your request would reveal personal information about another person, or if you ask us to delete information we are required by law to keep or have compelling legitimate interests in keeping (such as for fraud prevention purposes). Your Personal Information may remain in our archives and information you update or delete, or information within a closed account, may persist internally for our administrative purposes, to the extent permitted by law. In addition, we typically will not remove information you posted publicly through or on the Service. Bear in mind that neither you nor BluePond.AI can delete all copies of information that has been previously shared with others on the Service.

9. SECURITY

BluePond.AI takes commercially reasonable steps to help protect and secure the information it collects and stores about BluePond.AI Users. All access to the Site is encrypted using industry-standard transport layer security technology ("TLS"). When you enter sensitive information, we encrypt the transmission of that information using secure socket layer technology ("SSL"). We also use HTTP strict transport security to add an additional layer of protection. But remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure. Thus, while we strive to protect your Personal Information, BluePond.AI cannot ensure and does not warrant the security of any information you transmit to us.

10. STORING AND INTERNATIONAL TRANSFER OF PERSONAL INFORMATION

We are headquartered in Delaware United States and your data is stored in United States only. However, we may have service providers in other states and countries, and your personal information may be transferred to other locations outside of your state, province, or country where privacy laws may not be as protective as those in your state, province, or country.

11. LINKS TO OTHER SITES

Our Service contains links to other websites. If you choose to click on a third party link, you will be directed to that third party's website. The fact that we link to a website is not an endorsement, authorization or representation of our affiliation with that third party, nor is it an endorsement of their privacy or information security policies or practices. We do not exercise control over third party websites. These other websites may place their own cookies or other files on your computer, collect data or solicit Personal Information from you. We encourage you to read the privacy policies or statements of the other websites you visit.

12. PHISHING

Phishing websites imitate legitimate websites in order to obtain personal or financial information. Identity theft and the practice currently known as "phishing" are of great concern to BluePond.AI. If you believe you have received an email or had a similar interaction with a third party pretending to be BluePond.AI, please report it at [●].

13. CHANGES TO THIS POLICY

BluePond.AI may update this Privacy Policy at any time and any changes will be effective upon posting. In the event that there are substantial changes to the way we treat your Personal Information, we will display a notice through the Services prior to the change becoming effective. We may also notify you by email, in our discretion. However, we will use your Personal Information in a manner consistent with the Privacy Policy in effect at the time you submitted the information, unless you consent to the new or revised policy.

14. CALIFORNIA PRIVACY RIGHTS

Under California Civil Code section 1798.83, California residents are entitled to ask us for a notice identifying the categories of personal customer information which we share with our affiliates and/or third parties for marketing purposes, and providing contact information for such affiliates and/or third parties. If you are a California resident and would like a copy of this notice, please submit a written request to us via email at [●]. You must put the statement "Your California Privacy Rights" in your request and include your name, street address, city, state, and ZIP code. We are not responsible for notices that are not labelled or sent properly, or do not have complete information.

15. GRIEVANCE OFFICER

Any grievances which you may have with respect to the use of Information collected from you, may be directed to BluePond.AI's Grievance Officer at [●].

16. ACCEPTANCE OF THIS POLICY.

By using this site, you agree to this privacy policy. If you do not agree with the terms of this privacy policy—as it stands now or as it may be amended from time to time—do not continue to use this Site or Site Services. If you choose not to provide certain personally identifying information in registering with or accessing our Site and Site Services, certain Service may not be available to you