

## *Privacy Policy*

*updated Jan 31, 2021*

This Privacy Policy (the “Privacy Policy” or “Agreement”) is designed to explain what personal information Posh Technologies, Inc. (hereinafter, “Posh”, the “Company”, or “We”) collects, why we collect such data, how and when it is collected and shared, and how your content is handled. Posh provides customer service support via our Artificial Intelligence (“AI”) chatbots and related services (collectively the “Services”). For the purposes of this Agreement, “Personal Information” (or “PI”) means information that is related or may be used to identify an individual. We encourage all users of Posh Services and its website generally, to stay apprised of changes to this Privacy Policy, which may be updated from time to time. We will notify users of changes to this Agreement by posting a notice on our Website ([www.posh.tech](http://www.posh.tech) or the “Website”).

For the purposes of GDPR (the European General Data Protection Regulation); Posh is a Data Controller with respect to employees or applicants for employment to Posh and a supplier of Services to our Customers. We are a Data Processor with respect to PI about the end users who are customers of our clients (“End Users”) and our clients who use the Service (or “Customers”).

### *Information you Provide to Posh*

There are a number of ways that you may disclose PI to Posh. These include:

Interaction with the Services as an End User, where you will interact with our Services for the purpose of effectuating a support function by disclosing PI such as your username, password, email address or information, phone number, physical address, IP address or information, locations, transcripts of conversations with our AI rendering Services, and any and all information you choose to voluntarily disclose while interacting with this Website or the Services.

Using Services as a Customer. This is where a Customer or an employee or agent of the Customer uses our Services to provide support to their End Users. This may include PI such as your name, legal name, company or Customer name, address, phone number, username, password, Customer tax information and basic site information.

Correspondence by phone, e-mail, form entry, or other related forms of communication. We will only request disclosure of information necessary to provide you with products and our Services or to effectuate improvements/suggestions to our Website or Services.

Applying to work for Posh. We collect information you supply to us including your CV, cover letter, legal name, IP, email, and physical address, and other relevant information you choose to supply to us. ***We encourage you to refrain from disclosing sensitive PI that is not relevant to our employment decision-making process such as gender, height, weight, medical history, religion or philosophical/political views, financial data, or others. We prefer not to handle this information for our mutual benefit.***

Supplying us with goods or services—suppliers may provide information regarding their contact name, email and physical address, telephone number, or any other information you so choose to provide.

#### *Information that we collect through your uses of the Website or the Services*

We collect information to provide our Customers and End Users with a superior service and customer experience, diagnose technical problems or issues, and generally administrate and improve our Website and Services for your benefit. Posh collects this data from visitors and Customers that interact with the Website. We may also track and analyze non-PI information, aggregate usage, and other statistical information from visitors and Customers who interact with the Website.

We receive message logs and usernames when End Users interface and interact with Services provided to our Customers. These logs contain any information the End User chooses to supply including but not limited to usernames, email or physical address, phone numbers, payment information, passwords, etc. ***You are encouraged to supply only information that is necessary to use our Services and not volunteer any sensitive PI unprompted.***

Posh and our Customers utilize a variety of technologies like cookies, scripts, beacons, and tags for analysis of End User's use of the Website, administration of the Website, and gathering aggregated information about how End Users interact with the Website and/or our Services. Our Website may also employ clear gifs, images, and scripts which are used as a tool to enhance and manage our Website. This information is anonymized and not connected or tied to our Customers', End Users', or visitors' PI.

#### *Cookies*

Cookies consist of files that web browsers place on an End User's, Customer, or visitor's computer hard drive that allow for identification of returning visitors. You may also have cookies transmitted to you by interacting with links to third-party websites. We utilize cookies to enhance our product and the End User experience generally. These cookies, on their own, cannot identify you personally. Unless you choose to identify yourself, these cookies cannot be used to positively identify you.

There are two general types of cookies: session and persistent.

Session cookies exist while you are interacting with the Website and are erased from your hard drive once the End User or visitor closes the web browser or turns off their computer. Persistent cookies remain on your computer after interfacing with the Website.

Posh uses session cookies that allow your unique identification while you are logged in. This enables us to verify your identity when you are logged in or otherwise interacting with our Services or the Website. These are required to successfully interact with our Services and the Website. We use persistent cookies that are only usable and readable by us to identify End Users, Customers, or visitors to our Website. You may disable your web browser's ability to accept

cookies, but this will affect your ability to successfully interact with our Website or utilize our Services.

#### *How the above information is used by Posh*

We collect the information discussed above to provide our Services to our Customers, their End Users, and visitors to our Website, market Posh's products and services, and improve our Website's interface. We use this information in the following ways:

#### **Customers**

We use our Customer information to provide you and your End-Users with our Services. We will also use your information to set you up in our systems as a Customer, communicate about the provision of Services, coordinate on projects we will perform for you as a Posh Customer, and facilitate payment for Services rendered.

#### **End Users**

We will use information to provide you with customer support, where you are a customer or End User of an organization that utilizes Posh's Services (i.e. our Customers). We will also use information, such as your interactions with our Service, to improve the quality of the Services we provide.

#### **Visitors to our Website**

We use information to administrate and improve our Website and to ensure it is safe and secure. We will also use this information to better understand the effectiveness of our marketing and deliver relevant advertising to you. We may also use this information for analysis to better understand how visitors interact and interface with our Website.

#### **Job Applicants**

We will use information furnished for the purpose of employment to create a profile for you in our system.

#### *Who Posh shares information with*

We may share your PI with our Customers in the performance of providing our Services. We may also share your PI with people who supply Posh with goods or services. We will also share information when you use our Services to interact with our Customers—this information will only be shared with the particular Customer you are interacting with.

Additionally, we may disclose your PI in the event we buy or sell any business or assets and we provide your PI to the prospective seller or purchaser. We may disclose your PI if our business or certain assets are acquired by the third party and your PI is an asset transferred in the acquisition.

We may also be required to disclose or share your PI or other information to comply with law, to enforce and/or apply any other agreement we have with you or our Customers, and to protect our rights and the rights of our Customers and others. This includes the exchange of information with

other organizations for the purposes of fraud protection and risk reduction. We keep a list of processors with whom we share your PI below. This list may be updated from time to time.

Subprocessor	Purpose	Location	Website
LogRocket	Web services analytics	USA	<a href="https://logrocket.com/">https://logrocket.com/</a>
Google Cloud	Infrastructure hosting	USA	<a href="https://cloud.google.com/">https://cloud.google.com/</a>
AWS	Infrastructure hosting	USA	<a href="https://aws.amazon.com/">https://aws.amazon.com/</a>
Twilio	Telephony infrastructure	USA	<a href="https://www.twilio.com/">https://www.twilio.com/</a>
Hubspot	Customer CRM	USA	<a href="https://www.hubspot.com/">https://www.hubspot.com/</a>
Auth0	Secure authentication	USA	<a href="https://auth0.com/">https://auth0.com/</a>

#### *Data Retention*

The amount of time we retain your data is dependent on the type of information and the purposes for which it is used. We will keep your information only as long as required or permitted and Posh will delete your PI when our business relationship with a Customer terminates.

#### *Data Location*

Data collected from you may be transferred to and/or stored in the United States, which is located outside of the European Economic Area (“EEA”) for which there is an adequacy decision relating to the safeguards of PI data from the European Commission (the EU-US Privacy Shield framework). For information on the security measures and safeguards we have in place in the United States, you may reach out to us at [privacy@posh.tech](mailto:privacy@posh.tech).

#### *Data Rights*

You have the right to access PI we have about you and you have the right to require us to modify or update PI about you that is inaccurate without undue delay.

As a Customer of Posh, you also have the right to require us to erase PI we have about you when it is no longer necessary for Posh to hold your PI or you have withdrawn your consent to have your data processed. You also have the right to object to Posh processing PI about you. You have the right to request from us a record of the PI that Posh has about you in a portable, commercially reasonable format. Further, you have a right to request restrictions on the PI Posh

processes about you. Finally, you have a right to follow up on requests made by you regarding your PI and challenges to PI handling policies and practices at Posh.

You have the right to withdraw your consent to having your data processed at any time by reaching out to [privacy@posh.tech](mailto:privacy@posh.tech). Any information that was processed before the withdrawal of your consent is and remains lawful. Where Posh acts as a Data Processor on behalf of a Data Controller (our Customers), you should direct requests to exercise the above rights to the Data Controller (i.e., the organization you have the relationship with).

#### *Residents of the European Union*

If you are a resident of the EU, you may submit a complaint to your local privacy commission or supervisory authority with respect to Posh's processing of your PI.

#### *Residents of California*

Residents of California are afforded certain rights discussed below under the California Consumer Privacy Act ("CCPA") and the California Privacy Rights Act ("CPRA").

For information on the PI Posh has collected over the last twelve (12) months, please refer to the *Information you provide to Posh* section above. Our use of this information is described in *Information that we collect through your uses of the Website or the Services*, also above. Posh will only share this information when you make a customer support query to one of our Customers who utilize our Services.

Posh does not sell, as defined in the CCPA and CPRA, PI we collect.

The CCPA and CPRA provides California consumers with the right to request details on the categories or specific PI we collect and how we use and/or disclose PI, to delete their PI, to opt out of sales (as defined in CCPA and CPRA) of their PI. It is also unlawful to discriminate against consumers who choose to exercise these rights.

California consumers may reach out to us to request exercising their rights under the CCPA and CPRA at [privacy@posh.tech](mailto:privacy@posh.tech). We will use reasonable steps to verify your identity and effectuate lawful requests—government issued ID may be required.