

## **Privacy Policy**

Last updated: May 15, 2023

We, at Tillion Inc. (“**Tillion**”, “**we**”, “**our**” or “**us**”) are committed to the responsible and proper treatment of personal information (as defined below) and to properly communicate our data practices.

This Privacy Policy (the “**Policy**”) describes how we collect, store, use and disclose your Personal Data when you (i) visit our websites, including: [www.tillion.ai](http://www.tillion.ai) and [www.tillion.io](http://www.tillion.io) (the “**Site**”), (ii) sign up or attend our events, webinars, and newsletters; (iii) register for a demo; (iv) use our platform (the “**Platform**”) and any related APIs; and (v) any other use of our services or applications (collectively, the “**Services**”).

Our Services are designed for businesses. Accordingly, we treat all personal information covered by this Policy, including information about any visitors to our Site, as pertaining to individuals acting as business representatives, rather than in their personal capacity.

Specifically, this Policy describes our privacy practices:

1. Personal Information We Collect.
2. How we Use Information Collected.
3. Sharing Personal Information.
4. Retaining Personal Information.
5. Transfer of Personal Information.
6. Cookies and Tracking Technologies.
7. Data Security.
8. Your Choices.
9. Data Subject Rights.
10. Additional Notices.

**Please read this Policy carefully and make sure that you fully understand our privacy practices.**

Any capitalized but undefined term in this Policy shall have the meaning given to it in our Terms of Service (“**Terms**”).

## 1. **Personal Information we Collect.**

When we use the terms “*personal data*” or “*personal information*” in this Policy, we mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to an individual. It does not include aggregated or anonymized information that is maintained in a form that is not reasonably capable of being associated with or linked to an individual.

We collect or generate the following categories of personal information in relation to the Services:

### Personal information you provide us.

- I. Account Creation. When you create an account or otherwise use the Services, we collect information such as your name, email address, telephone number, password, title, and any optional information you choose to add.
- II. Communication with Us. We collect information from you such as email address, telephone number, or mailing address when you request information about our Services, register for our newsletter, request a demo, request customer or technical support, or otherwise communicate with us. We also collect the contents of messages or attachments that you may send to us, as well as other information you choose to provide, and that may be associated with your communications.
- III. Job Applications. We may post job openings and opportunities on the Site. If you reply to one of these postings by submitting your application, CV or additional information to us, we will collect and use your information to assess your qualifications and to communicate with you.

### Information we collect automatically.

Through your interaction with our Services we automatically collect (including through the use of analytics and system monitoring tools) Personal information that may include your Internet Protocol (IP) address and approximate general locations based on your IP addresses, device and application data (such as operating system, mobile device or app id, browser version, location and language settings used), system logs of actions and events attributed to those IP addresses, devices and applications, cookies and pixels installed or utilized on your device, usage and recorded activity such as sessions, clicks, use of features, pageview, logged activities and other interactions. Information we collect may be associated with accounts and other devices.

Please note that you are not legally required to provide us with any of your personal information and may do so (or avoid doing so) at your own free will. If you do not wish to provide us with your personal information, or to have it processed by us or any of our service providers, you can not visit or interact with our Site, nor use our Services. You can also submit a request to exercise your rights as further explained in Section 9 below.

## **2. How we Use Information Collected.**

We use personal information as necessary to provide our Services and develop it ("**Performance of Contract**"); to comply with our legal and contractual obligations ("**Legal Obligations**"); to support our legitimate interests in maintaining and improving our Services (such as providing customer and technical support, marketing, advertising and selling our Services, etc) and protecting and securing our customers, ourselves and our Services from misuse and law violations ("**Legitimate Interests**").

If you reside or are using the Services in a territory governed by privacy laws under which consent is the only or most appropriate legal basis for the processing of personal information as described herein (in general, or specifically with respect to the types of personal information you expect or elect to process or have processed by us) ("**Consent**"), your acceptance of our Terms and this Policy will be deemed as your consent to the processing of your personal information for all purposes detailed in the Policy. If you wish to revoke such consent, please contact us via [privacy\[at\]tillion\[dot\]ai](mailto:privacy[at]tillion[dot]ai).

Specifically, we use personal information for the following purposes:

- I. To facilitate, operate, and provide the Services (*Performance of Contract; Legitimate Interests*).
- II. To test, monitor, study and analyze use of the Services (*Performance of Contract; Legitimate Interests*).
- III. To provide prospects and customers with assistance and support, to test and monitor the Services, diagnose or fix technical issues, and to provide training (*Performance of Contract; Legitimate Interests*).
- IV. To contact you with general or personalized service-related messages, as well as promotional messages that may be of specific interest to you (*Performance of Contract; Legitimate Interests; Consent*).
- V. To enforce our Terms, this Policy and other contractual arrangements, to comply with court orders and warrants, prevent misuse of the Services and to take any action in any legal dispute and proceeding (*Performance of Contract; Legitimate Interests; Legal Obligation*).

- VI. To gain a better understanding on how you use and interact with our Services, and how we could improve users' experience, and continue improving our products, offerings and the overall performance of our Services (*Legitimate Interests*).
- VII. To support and enhance our data security measures, including for the purposes of preventing and mitigating the risks of fraud, error or any illegal or prohibited activity (*Performance of Contract; Legitimate Interests*).
- VIII. To facilitate and optimize our marketing campaigns and sales operations, and to manage and deliver advertisements for our Services more effectively, including on other websites and applications (*Legitimate Interests; Consent*).
- IX. To invoice and process payments (*Performance of Contract; Legitimate Interests*).
- X. To create aggregated statistical data, inferred non-personal data, or anonymized or pseudonymized data (rendered non-personal and non-identifiable), which we or our Service Providers may use to provide and improve our Service, or for any other purpose (*Performance of Contract; Legitimate Interests*); and
- XI. To comply with applicable laws, regulations and standards (*Performance of Contract; Legitimate Interests; Legal Obligation*).

### **3. Sharing Personal Information.**

- I. Service Providers: We may engage selected third-party to perform services complementary to our Services. Such service providers may include hosting and server co-location services, communications and content delivery networks (CDNs), data security services, fraud detection and prevention services, analytics services, e-mail distribution and monitoring services, session, call or activity recording and analysis services, remote access services, performance measurement, data optimization and marketing services, social and advertising networks, content providers, e-mail, voicemails, support and customer relation management systems, and our legal, financial and compliance advisors (collectively, "**Service Providers**"). Our Service Providers may have access to personal information, depending on each of their specific roles and purposes in facilitating and enhancing the Services, and may only use the information for such limited purposes and commit to protect your privacy as determined in our agreements with them.
- II. Advertising Partners: We do not disclose or use your information to advertise any third party's products or services via the Services. However, we may disclose your information to third-party advertising partners to market our own Services and grow our Services' user base, such as to provide targeted marketing about our own Services via third-party services. Please see the "Your Choices" and "Data Subject Rights" sections below for additional information.

- III. Legal Compliance: In exceptional circumstances, we may disclose or allow government and law enforcement officials access to your personal information, in response to a subpoena, search warrant or court order (or similar requirement), or in compliance with applicable laws and regulations. Such disclosure or access may occur if we believe in good faith that: (a) we are legally compelled to do so; (b) disclosure is appropriate in connection with efforts to investigate, prevent, or take action regarding actual or suspected illegal activity, fraud, or other wrongdoing; or (c) such disclosure is required to protect the security or integrity of our Services.
- IV. Protecting Rights and Safety: We may share your personal information if we believe in good faith that this will help protect the rights, property or safety of our Company, any of our users, or any members of the general public.
- V. Merger, sale, or other structural change: If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of some or all assets, or transition of service to another provider, then your information may be sold or transferred as part of such a transaction, as permitted by law and/or contract.

#### **4. Retaining Personal Information.**

We retain your personal information as long as you use our Services or to fulfill the purpose(s) for which it was collected; to provide our Services; in order to comply with applicable laws and our contractual obligations; to pursue our legitimate business purposes; or to protect ourselves from any potential disputes (for example: as required by laws applicable to log-keeping, records and bookkeeping, and in order to have proof and evidence concerning our relationship, should any legal issues arise following your discontinuance of use), all in accordance with this Policy.

Please note, that except as required by applicable law or our specific agreements with you, we will not be obligated to retain your personal information for any particular period, and we are free to securely delete it, restrict access to it or de-identify potentially identifiable information at our sole discretion.

#### **5. Transfer of Personal Information.**

We may store and process personal information by using third parties in the European Union, the United States and other countries, as reasonably necessary for the proper performance and delivery of our Services, or as may be required by law. While privacy laws may vary between jurisdictions, we require our Service Providers to provide us with adequate security commitment to protect your privacy as required under the applicable law and this Policy.

If you are located in the European Economic Area (EEA), note that in case of transfer of personal information related to you to other jurisdictions, we will use appropriate safeguards by way of entering into the European Union (EU) Standard Contractual Clauses with the relevant recipients of such information.

## **6. Cookies and Tracking Technologies.**

We and our Service Providers may use cookies and other technologies for performance, tracking, analytics and personalization purposes. We may share non-identifiable or aggregated extracts of such information with our partners for our legitimate business purposes.

Cookies are packets of information sent to your web browser and then sent back by the browser each time it accesses the server that sent the cookie. Some cookies are removed when you close your browser session. These are the “Session Cookies”. Some last for longer periods and are called “Persistent Cookies”. We use both types.

We use Persistent Cookies to remember your log-in details and make it easier for you to log-in the next time you access the Platform. We may use this type of cookies and Session Cookies for additional purposes, to facilitate the use of the Site’s features and tools. For additional information about cookies, you may find the following websites useful: [www.allaboutcookies.org](http://www.allaboutcookies.org), [www.youronlinechoices.co.uk](http://www.youronlinechoices.co.uk).

Whilst we do not change our practices in response to a “Do Not Track” signal in the HTTP header from a browser or mobile application, you can manage your cookies preferences, including whether or not to accept them and how to remove them, through your browser settings. Please bear in mind that disabling cookies may complicate or even prevent you from using the Site.

Additional information and a list of the cookies we use can be found in our Cookie Policy.

## **7. Data Security.**

In order to secure your personal information we use industry-standard physical, procedural and technical security measures, including encryption as appropriate. However, please be aware that regardless of any security measures used, we cannot and do not guarantee the absolute protection and security of any personal information stored with us or with any third parties. We cannot guarantee that our Services will be immune from any wrongdoings, malfunctions, unlawful interceptions or access, or other kinds of abuse and misuse. To the fullest extent permitted by applicable law, we do not accept liability for unauthorized disclosure.

By using the Services or providing information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the Services.

## **8. Your Choices.**

If you do not agree to the collection, use or sharing of personal information as described in this Policy, please do not use the Services or provide us with such information. By using the Services or providing us with personal information through the Services, you are "opting in" to the collection, use and sharing of that information as described in this Policy.

If you wish to unsubscribe our promotional communications or newsletters, you can notify us at any time via [privacy@tillion.ai](mailto:privacy@tillion.ai), or by following the "unsubscribe" instructions.

Please note that when you ask us to exercise any of your rights under this Policy or applicable law, we may need to ask you to provide us with certain credentials to make sure that you are who you claim you are and to ask you to provide further information to better understand the nature and scope of information that you request to access. Such additional information will be then retained by us for legal purposes (for example: as proof of the identity of the person submitting the request). We may redact from the data which we will make available to you, any personal information related to others.

## **9. Data Subject Rights.**

Individuals have rights concerning their personal information. If you wish to exercise your privacy rights under any applicable law, including the EU or UK General Data Protection Regulation (GDPR), the California Consumer Privacy Act (CCPA), the California Privacy Rights Act (CPRA), or other privacy laws and regulations, please contact us at: [privacy@tillion.ai](mailto:privacy@tillion.ai). Such rights may include - to the extent applicable to you under the laws which apply to you – the right to know/request access to specific pieces of personal information collected; categories of personal information collected; categories of sources from whom the personal information was collected; purpose of collecting personal information; categories of third parties with whom we have shared personal information, to request rectification or erasure of your personal information held with us, or to restrict or object to such personal information processing, or to port such personal information. Further details about your rights under EU data protection laws, is available on the EU Commission's website at [https://commission.europa.eu/index\\_en](https://commission.europa.eu/index_en).

Note that in the event of an erasure request, we may retain a copy of your Personal Data for our record-keeping purposes and to avoid entering your personal data in our systems after your request.

## 10. **Additional Notices.**

- I. Updates and Amendments: We may modify this Privacy Policy from time to time in our sole discretion. If there are any material changes to this Privacy Policy, we will notify you as required by applicable law. You understand and agree that you will be deemed to have accepted the updated Privacy Policy if you continue to use the Services after the new Privacy Policy takes effect.
- II. Children: Our Services are intended for general audiences and are not directed at children. We do not knowingly collect personal information from children and do not wish to do so. If we learn that a person under legal age is using the Service, we will make our best efforts to promptly delete any personal information stored with us with regard to that person. If you believe that we might have any such data, please contact us at: [privacy\[at\]tillion\[dot\]ai](mailto:privacy[at]tillion[dot]ai).
- III. Questions, Concerns or Complaints: If you have any comments or questions regarding our Privacy Policy, or if you have any concerns regarding your personal information held with us, please contact us at: [privacy\[at\]tillion\[dot\]ai](mailto:privacy[at]tillion[dot]ai). If you are a GDPR or UK-GDPR protected individual, you also have the right to lodge a complaint with an EU supervisory authority, or the UK Information Commissioner's Office, as appropriate.