

# PRIVACY POLICY

*Effective Date: JULY 20, 2020*

## YOUR PRIVACY IS IMPORTANT TO US

We take your privacy very seriously and we are committed to protecting it. We believe that you should easily know what information we collect and use, as well as to understand your rights in respect of your personal information.

This Privacy Policy sets out how Paige, Inc. (“Paige,” “us,” “we,” or “our”) collects, uses, and discloses information obtained through our websites, including paige.ai and its subdomains and landing pages, (collectively, “Websites”) and the online services we operate (collectively, the “Services”) and applies solely to information collected by or in connection with the Websites and the Services and not those that Paige does not operate.

Your access and use of the Websites and Services are subject to this Privacy Policy, and any separate Terms of Use for any of the Websites and Services that may be in effect at any time.

Please read the following carefully to understand our policies and practices regarding your information and how we will treat it. If there are any terms in this Privacy Policy that you do not agree with, please discontinue use of our Websites and our Services.

## WHAT INFORMATION WE COLLECT

“Personal Information” is information that can be used to identify you by itself or when it is combined with other information., such as a name, address, cell phone number, account information, financial, insurance, credit card information, or e-mail address.

We may collect Personal Information from you in various ways, such as when you provide it to us by using contact forms on our Websites, which may include your organization, email address, name, telephone number, geographic information, and any other information you input, such as the purpose of contacting us and your preferences on your interests in our products and services.

Certain aspects of our Services may require you to complete an account creation form, which may require you to provide certain Personal Information and create a user name and password. Upon creating an account for use of our Services, additional information may be automatically generated such as any preferences you indicate.

We also collect and use “Non-Personal Information” that cannot identify you either alone or in combination with other information, such as your location and use statistics of our Websites and Services that may be automatically generated when you use the Websites and Services. We may collect this information through third party providers (such as Google Analytics) when you visit the Websites or use our Services. Such Non-Personal Information may include, without limitation, your internet protocol (IP) address, location positioning information provided by the location services and GPS features of the device you are using to access one of



our Websites or Services when location services have been enabled, browser type, operating system, the dates and times of page views, the duration of time spent at those pages, and if you linked to one of our Websites from another website, the address of that other website.

## **WHAT WE DO WITH THE INFORMATION WE GATHER**

Our primary purpose in collecting this information is to understand your interest in our products and services and to provide you with better service. We will not use, disclose, or share your information except as described in this Privacy Policy.

### **How we use the information**

In particular, we may use your information for the following purposes:

- Manage the Services we provide to you, including your registration and account;
- Send you technical notices, updates, security alerts, information regarding changes to our policies, and support and administrative messages;
- Prevent and address fraud, breach of policies or terms, and threats or harm;
- Monitor and analyze trends, usage, and activities;
- Conduct research, including focus groups and surveys;
- Identification and authentication of a user;
- Process and deliver the Services to you;
- Improvement of our Services and related products, services, other Paige websites, applications and marketing efforts;
- Provide access to free and/or purchased downloads and other similar content;
- With your permission, to correspond with you about your interests in our services, products and our organization;
- If you have opted-in to receive additional communications, we may periodically send notifications about new products, special offers or other information which you have indicated are of interest to you;
- We may use the information to customize the website content presented to you and to align with your computer's operating system;
- To correspond with you, respond to your comments, questions, and requests, and provide customer service;
- To enable us to meet our legal obligations if you buy something from us, such as retaining required business records;
- To conduct our business and perform related research, develop analytics, and aggregated data that allow us and our business partners to improve our Services and related products and services.

### **How we share the information**

We do not sell, trade, or otherwise transfer to outside parties Personal Information we collect from you without your consent, except as described below:

- We may share aggregated demographic information about our user base with select third parties. This information does not identify individual users. We do not link aggregate user data with Personal



Information. We may use and publicize aggregate information in any manner that does not identify you, without your consent.

- We may share aggregated data to conduct our business, improve the delivery of our Services, to develop analytics, and to enable us and our business partners to improve and promote our products and services.
- We may share Personal Information made available by users in public areas, such as any message boards or blogs we make available as part of our Services, for purposes related to marketing products, services, special deals, and promotions offered by us or one of our partners.
- We may share Personal Information to authorized agents or third-party contractors whom we employ to perform tasks on our behalf and to the extent we need to share information with them to conduct our business or to provide our products, services, and offers to you.
- We may disclose Personal Information to third parties if we believe it is necessary to investigate potential violations of our Terms of Use, or to enforce those Terms of Use.
- We may disclose Personal Information in the circumstances described under “Legal Disclaimer” below.

## Legal Disclaimer

We may disclose the information we collect from you in the following circumstances:

- As required by law;
- If we believe that disclosure is necessary to protect ours or others’ rights, property, or safety;
- To comply with a judicial proceeding, court order, or legal process served on us or the Services;
- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets;
- If Paige or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets; or
- In connection with any other actual or proposed corporate transaction or insolvency proceeding involving all or part of the business or assets to which the information pertains. Those who choose to provide Personal Information from outside the United States do so on their own initiative and at their own risk and are responsible for compliance with all applicable laws and regulations. By using the Services, you consent to having any Personal Information you provide to us transferred to and processed in the United States. BECAUSE SOME JURISDICTIONS DO NOT PERMIT CERTAIN LIMITATIONS OR DISCLAIMERS OF LIABILITY, THESE LIMITATIONS MAY NOT APPLY TO YOU.

## Length

We keep your Personal Information only for as long as we continue to have a business purpose for it or as otherwise required by law.

## Communications from Us and Other Third Parties

When you send email or other communications to Paige, we may retain those communications in order to process your inquiries, respond to your requests, and improve our Websites and related products and services. When you send and receive messages, we may collect and maintain information associated with those messages.



We may send you information by email on products, services, special deals, and promotions offered by us or one of our partners. If you are an existing customer, we will only contact you by email with such information where you have consented for us to do.

With your permission, we may share your information with our marketing partners and other third parties so that they may contact you directly regarding products, services, special deals, and promotions. We are not responsible for how these third parties may use your information, and such uses are subject to such party's own policies.

Where we permit selected third parties to use your data, we (or they) will contact you by email only if you have consented to this.

Out of respect for your privacy, we will also provide an option to elect not to receive these types of communications. You can also exercise the right at any time by contacting us at [privacy@paige.ai](mailto:privacy@paige.ai)

### **Service-Related Announcements**

We may send you service-related announcements on rare occasions when it is necessary to do so. For instance, if our Services are temporarily suspended for maintenance, we might send you an email. Generally, you may not opt out of these communications, which are not promotional in nature. If you do not wish to receive them, you have the option to deactivate your account with us.

### **Customer Service**

Based upon the Personal Information you provide us, we may send you a welcome email to verify your username and password for the Services. We will communicate with you in response to your inquiries, to provide the services you request, and to manage your account. We will communicate with you by email or telephone, in accordance with your preference. You may contact customer service at [support@paige.ai](mailto:support@paige.ai)

### **Storage**

Paige will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

The information that we collect directly from you is stored in the United States by us and/or our business partners for the purposes of providing the Websites and other services uses outlined in this Privacy Policy and by our Terms of Use and by submitting your Personal Information, you agree to this storage.

All information you provide directly to us online is stored on our secured servers which are located in the United States. Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Services, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Some of the information collected through the use of cookies may be stored outside of the United States. See our section below on Cookies to review what information we collect through such cookies.



## **SECURITY**

We will take all technical, administrative, and physical steps reasonably necessary to restrict access to Personal Information to those of our employees, agents, contractors, or representatives who require access to such information to perform tasks assigned to them by us.

We strive to use reasonable physical, technical, and administrative measures to protect information under our control. However, no method of transmission or storage of data is 100% secure, and we will not be responsible for any damage that results from a security breach of data or the unauthorized access to or use of information, whether Personal Information or Non-Personal Information. To the extent we provide your Personal Information to any third parties, we will request that they use substantially the same level security measures to protect your information. If you create copies of information from the Websites or our Services, we cannot protect the security and privacy of the information contained in such copies.

## **LINKS TO OTHER SITES**

Our Websites may contain links to enable you to easily visit other websites of interest. Once you use these links to leave any of our Websites, we do not have any control over other websites and their data collection practices. Accordingly, we cannot be responsible for the protection and privacy of any information which you provide while visiting other websites, as those sites are not governed by this Privacy Policy.

## **CONTROLLING YOUR PERSONAL INFORMATION**

You may choose to restrict the collection or use of your Personal Information we have gathered in the following way:

- Opting in or out of additional communications by checking the associated box on forms used within our Websites.
- If you have previously agreed to our use of your Personal Information, you may revoke your consent at any time.

You have the right to request details of Personal Information which we hold about you at any time under current applicable data protection laws and regulations.

## **INFORMATION YOU POST TO PUBLIC AREAS OR PROVIDE TO US**

Please keep in mind that whenever you voluntarily make Personal Information or other private information available in public areas for viewing by third parties online (for example, on blogs, discussion forums, or other community posting or social networking sites), such information can be seen, collected, and used by others besides us. We cannot be responsible for any unauthorized third-party use of such information, nor for the substance of any such user-generated content.

## **CALIFORNIA PRIVACY RIGHTS**

The state of California has passed state laws that provide additional privacy rights to individuals who reside in California.



The categories of Personal Information that we collect from you can be found in the **“Information We Collect”** section above, which you can access by clicking [here](#).

The business or commercial purposes for which we use the categories of Personal Information we collect can be found in the **“How We Use the Information”** and **“How We Share the Information”** section above, which you can access by clicking [here](#) and [here](#).

### ***Your California Rights under CCPA***

You have the right to request that we disclose certain information to you about our collection and use of your Personal Information over the past 12 months (“Right to Know”). You have the Right to Know (i) the categories of Personal Information we collected about you; (ii) the categories of sources for the Personal Information we collected about you; (iii) our business or commercial purpose for collecting that Personal Information; (iv) the categories of third parties with whom we share that Personal Information; (v) the specific pieces of Personal Information we collected about you.

You have the right to request that we delete any of your Personal Information that we collected from you and retained, subject to certain exceptions (“Right to Delete”). Once we receive and confirm your verifiable request, we will delete your Personal Information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us to: (i) complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you; (ii) detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities; (iii) debug products to identify and repair errors that impair existing intended functionality; (iv) exercise free speech, ensure the right of another party to exercise their free speech rights, or exercise another right provided for by law; (v) enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us; (vi) comply with a legal obligation; or (vii) make other internal and lawful uses of that information that are compatible with the context in which you provided it.

### ***Exercising Your Rights***

To exercise your Right to Know or Right to Delete, please submit a verifiable request to us by sending an email to [privacy@paige.ai](mailto:privacy@paige.ai).

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable request related to your Personal Information. The verifiable request must: (i) provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative; (ii) describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it. We may need to contact you to request additional information in order to verify you are the person about whom we collected Personal Information or that you are an authorized representative. We will not use any information provided as part of a request, including any contact information you provide or that we request in order to respond to or verify a request, for any purpose other than to respond to or verify your request.



We will make an effort to respond to your verifiable request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing either by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period before our receipt of the verifiable request. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

### ***Non-Discrimination***

We will not discriminate against you for exercising any of your CCPA rights by (i) denying you goods or services; (ii) charging you a different price or rates for goods or services; or (iii) providing you a different level of quality of goods or service.

If you are a California resident and would like to get more information about exercising any of your rights under these laws, please send an e-mail to [privacy@paige.ai](mailto:privacy@paige.ai) or by writing to us at 11 Times Square, 37<sup>th</sup> Floor, New York, NY 10036.

### **MINORS**

Our Websites and Services, and any other products and service we may provide through our Websites are not directed nor marketed to people under 18 years of age. We do not knowingly collect Personal Information from children under 18. The Websites and the services are not designed or intended to attract, and is not directed to, children under eighteen (18) years of age. If we become aware that a child under 18 has provided us with Personal Information, we will take reasonable steps to remove such information from our systems and terminate the applicable account. If you become aware that a child has provided us with Personal Information without your consent, please contact us at [privacy@paige.ai](mailto:privacy@paige.ai).

### **INTERNATIONAL**

Our Websites and Services are based in the United States (“US”) and operate under US Law.

We make no representation that information provided by the Websites or any of our services is appropriate or available for use outside the US or complies with laws outside of the US. If you are located outside of the US, the information we collect may be transferred to and processed in the US and in other countries where the privacy laws may not be the same as the laws where you reside. Those who choose to access the Websites or our services from outside the US do so on their own initiative and at their own risk and are responsible for compliance with all applicable laws and regulations outside the US.

### **COOKIES**

Certain pages of the Websites and/or html email correspondence may use session cookies, persistent cookies or web beacons to anonymously track unique visitors, save website preferences and to allow us to recognize visits from the same computer and browser. Some cookies are essential for the operation of our Site (“Essential Cookies”). These cookies enable services you have specifically asked for. These cookies remain on



your device only until you close your browser after visiting our websites. Some cookies are used to collect anonymous information on the pages visited (“Performance Cookies”). For example, we might use Performance Cookies to keep track of which pages are most popular, which method of linking between pages is most effective, and to determine why some pages are receiving error messages. These cookies remain on your device only until you close your browser after visiting our website. Some cookies remember choices you make to improve your experience (Functionality Cookies”). These Functionality Cookies remain on your device for an extended period of time. When you revisit our Websites we recognize Functionality Cookies and remember your preferences or can automatically log you on to the website. Personal information on our system may be associated with Functionality Cookies but the cookies themselves do not contain any of your personal information. Finally we may use “Behaviorally Targeting Advertising Cookies” which collect information about your browsing habits to make advertising relevant to you and your interests. You have the option to reject the Websites’ cookies and still use the Websites. However, your access to the Website may be limited. Further general information about cookies and how they work is available at [www.allaboutcookies.org](http://www.allaboutcookies.org).

We may from time to time allow selected third parties to place cookies through the Websites to provide us with better insights into the use of the Websites or user demographics or to provide relevant advertising to you. These third parties may collect information about a consumer’s online activities over time and across different websites when he or she uses our Websites. We may also permit third party service providers to place cookies through our Websites to perform analytic or marketing functions where you are notified of them and you have consented to the usage. We do not control the use of such third party cookies or the resulting information and we are not responsible for any actions or policies of such third parties.

We do not use technology that recognizes a “do-not-track” signal from your web browser.

## **CHANGES TO OUR PRIVACY POLICY**

Paige may update this Privacy Policy from time to time. If we decide to change our Privacy Policy, we will post those changes on this page and update the Privacy Policy modification date at the top of this page and, where appropriate, notify you of any material changes we make to the Privacy Policy by email. Please check back frequently to see any updates or changes to our Privacy Policy. This Privacy Policy shall be deemed effective as of the "Effective Date" date.

If you would like a copy of the information held on you please send your request by email to

[privacy@paige.ai](mailto:privacy@paige.ai), or by writing to us at:

11 Times Square, 37<sup>th</sup> Floor

New York, NY 10036

