

ADVISOR AI PRIVACY POLICY

Last Updated: January 8, 2024

This privacy notice for Advisor.AI Inc. ("**we**," "**us**," or "**our**"), describes how and why we might collect, store, use, and/or share ("**process**") your information when you visit our website advisor.ai, or any website of ours that links to this privacy policy, download or use our desktop or mobile application, or engage with us in any other related ways including sales, marketing, events, products or services (collectively "**Services**").

Questions or concerns? Reading this privacy notice will help you understand your privacy rights and choices. By using our Services, you confirm that you have read and understand the terms of this Privacy Policy. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at legal@joinadvisorai.com

SUMMARY OF KEY POINTS

This summary provides key points from our privacy notice, but you can find out more details about any of these topics by clicking the link following each key point or by using our table of contents below to find the section you are looking for.

What personal information do we process? When you visit, use, or navigate our Services, we may process personal information depending on how you interact with us and the Services, the choices you make, and the products and features you use. Learn more about personal information you disclose to us.

Do we receive any information from third parties? We may receive information from public databases, marketing partners, social media platforms, and other outside sources. We are not responsible for the accuracy of information provided by third parties. Learn more about information collected from other sources.

How do we process your information? We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other

purposes with your consent. We process your information only when we have a valid legal reason to do so. Learn more about how we process your information.

In what situations and with which types of parties do we share personal information? We may share information in specific situations and with specific categories of third parties. Learn more about when and with whom we share your personal information.

How do we keep your information safe? We have organizational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Learn more about how we keep your information safe.

What are your rights? Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information.

How do you exercise your rights? The easiest way to exercise your rights is by contacting us. We will review and act upon any request in accordance with applicable data protection laws.

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1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

***Summary:** We collect personal information that you provide to us.*

We collect personal information that you voluntarily provide to us when you register for the Services, express an interest in obtaining information about us or our products and Services, when you participate in activities for the Services, or otherwise when you contact us.

Personal Information Provided by You. The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

- debit/credit card numbers
- billing addresses
- contact or authentication data
- files
- passwords
- usernames
- job titles
- mailing addresses
- email addresses
- phone numbers
- file directories

Payment Data. We may collect data necessary to process your payment if you make purchases, such as your payment instrument number, and the security code associated with your payment instrument. We will not store or collect Your payment card details. That information is provided directly to [Stripe](#) our third-party payment processors whose use of your personal information is governed by their [Privacy Policy](#).

Social Media Login Data. We may provide you with the option to register with us using your existing external account details, like your Google, Microsoft, Facebook, X, or any other social media accounts.

This information is primarily needed to maintain the security and operation of our application(s), for troubleshooting, and for our internal analytics and reporting purposes.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

Information automatically collected

Summary: *Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our Services.*

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies. The information we collect includes:

- **Log and Usage Data.** Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, settings and information about your activity in the Services including, but not limited to, the date/time stamps associated with your usage, pages and files viewed, searches, actions you take such as which

features you use, device event information such as system activity, error reports (sometimes called "crash dumps"), and hardware settings.

- **Device Data.** We collect device data such as information about your computer, phone, tablet, or other device you use to access the Services. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.
- **Aggregate Information.** We collect statistical information about how both unregistered and registered users, collectively, use the Services. Some of this information is derived from personal information. This statistical data is not personal information and cannot be tied back to you, your account, or your web browser.

Information collected from other sources

Summary: *We may collect limited data from public databases, marketing partners, social media platforms, and other outside sources.*

For the purpose of enhancing our ability to provide relevant marketing, offers, and Services to you and update our records, we may obtain information about you from other sources, such as public databases, joint marketing partners, affiliate programs, data providers, social media platforms, and from other third parties. This information includes mailing addresses, job titles, email addresses, phone numbers, intent data (or user behavior data), Internet Protocol (IP) addresses, social media profiles, social media URLs, and custom profiles, for purposes of targeted advertising and event promotion. If you interact with us on a social media platform using your social media account (e.g., Facebook or Twitter), we receive personal information about you such as your name, email address, and gender. Any personal information that we collect from your social media account is subject to your social media account's privacy settings, and we encourage you to review these settings and adjust them to your comfort level.

2. HOW DO WE PROCESS YOUR INFORMATION?

Summary: *We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.*

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

- **To facilitate account creation and authentication and otherwise manage user accounts.** We may process your information so you can create and log in to your account, as well as keep your account in working order.
- **To deliver and facilitate the delivery of Services to the user.** We may process your information to provide you with the requested service.
- **To respond to user inquiries/offer support to users.** We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.
- **To send administrative information to you.** We may process your information to send you details about our products and Services, changes to our terms and policies, and other similar information.
- **To fulfill and manage your orders.** We may process your information to fulfill and manage your orders, payments, returns, and exchanges made through the Services.
- **To request feedback.** We may process your information when necessary to request feedback and to contact you about your use of our Services.
- **To send you marketing and promotional communications.** We may process the personal information you send to us for our marketing purposes in the event this is in accordance with your marketing preferences. You can opt out of our marketing emails at any time.
- **To protect our Services.** We may process your information as part of our efforts to keep our Services safe and secure, including fraud monitoring and prevention.
- **To identify usage trends.** We may process information about how you use our Services to better understand how they are being used so we can improve them.
- **To determine the effectiveness of our marketing and promotional campaigns.** We may process your information to better understand how to provide marketing and promotional campaigns that are most relevant to you.

- **To save or protect an individual's vital interest.** We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.

3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?

Summary: *We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e., legal basis) to do so under applicable law, like with your consent, to comply with laws, to provide you with Services to enter into or fulfill our contractual obligations, to protect your rights, or to fulfill our legitimate business interests.*

If you are located in the EU or UK, this section applies to you.

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

- **Consent.** We may process your information in the event you have given us permission (i.e., consent) to use your personal information for a specific purpose. You can withdraw your consent at any time.
- **Performance of a Contract.** We may process your personal information when we believe it is necessary to fulfill our contractual obligations to you, including providing our Services or at your request prior to entering into a contract with you.
- **Legitimate Interests.** We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. For example, we may process your personal information for some of the purposes described in order to:
 - Send users information about special offers and discounts on our products and Services;
 - Develop and display personalized and relevant advertising content for our users;
 - Analyze how our Services are used so we can improve them to engage and retain users;

- Support our marketing activities;
 - Diagnose problems and/or prevent fraudulent activities; and
 - Understand how our users use our products and Services so we can improve user experience.
- **Legal Obligations.** We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.
 - **Vital Interests.** We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as in situations involving potential threats to the safety of any person.

In legal terms, we are generally the "data controller" under European data protection laws of the personal information described in this privacy policy, since we determine the means and/or purposes of the data processing we perform. This privacy notice does not apply to the personal information we process as a "data processor" on behalf of our customers. In those situations, the customer we provide Services to and with whom we have entered into a data processing agreement is the "data controller" responsible for your personal information, and we merely process your information on their behalf in accordance with your instructions. If you want to know more about our customers' privacy practices, you should read their privacy policies and direct any questions you have to them.

If you are located in Canada, this section applies to you.

We may process your information if you have given us specific permission (i.e., express consent) to use your personal information for a specific purpose, or in situations where your permission can be inferred (i.e., implied consent). You can withdraw your consent at any time.

In some exceptional cases, we may be legally permitted under applicable law to process your information without your consent, including, for example:

- If collection is clearly in the interests of an individual and consent cannot be obtained in a timely way;
- For investigations and fraud detection and prevention;
- For business transactions provided certain conditions are met;

- If it is contained in a witness statement and the collection is necessary to assess, process, or settle an insurance claim;
- For identifying injured, ill, or deceased persons and communicating with next of kin;
- If we have reasonable grounds to believe an individual has been, is, or may be the victim of financial abuse;
- If it is reasonable to expect collection and use with consent would compromise the availability or the accuracy of the information and the collection is reasonable for purposes related to investigating a breach of an agreement or a contravention of the laws of Canada or a province;
- If disclosure is required to comply with a subpoena, warrant, court order, or rules of the court relating to the production of records;
- If it was produced by an individual in the course of their employment, business, or profession and the collection is consistent with the purposes for which the information was produced;
- If the collection is solely for journalistic, artistic, or literary purposes; and
- If the information is publicly available and is specified by the regulations.

4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

Summary: *We may share information in specific situations described in this section and/or with the following categories of third parties.*

Vendors, Consultants, and Other Third-Party Service Providers. We may share your data with third-party vendors, service providers, contractors, or agents ("**third parties**") who perform services for us or on our behalf and require access to such information to do that work. We have contracts in place with our third parties, which are designed to help safeguard your personal information. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will also not share your personal information with any organization apart from us. They also commit to protect the data they hold on our behalf and to retain it for the period we instruct. The categories of third parties we may share personal information with are as follows:

- Cloud Computing Services

- Communication & Collaboration Tools
- Data Analytics Services
- Data Storage Service Providers
- Payment Processors
- Sales & Marketing Tools
- User Account Registration & Authentication Services
- Government Entities
- Performance Monitoring Tools
- Product Engineering & Design Tools
- Testing Tools
- Website Hosting Service Providers
- Recruiting Agencies interested in placing users in an employment role
- Companies or other organizations interested in hiring users

We also may need to share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with or during negotiations of any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honor this privacy notice. Affiliates include our parent company and any subsidiaries, joint venture partners, or other companies that we control or that are under common control with us.
- **Business Partners.** We may share your information with our business partners to offer you certain products, services, or promotions.

5. WHAT IS OUR STANCE ON THIRD-PARTY WEBSITES?

Summary: *We are not responsible for the safety of any information that you share with third parties that we may link to or who advertise on our Services, but are not affiliated with our Services.*

The Services may link to third-party websites, online services, or mobile applications and/or contain advertisements from third parties that are not affiliated with us and which may link to other websites, services, or applications. Accordingly, we do not make any guarantee regarding any such third parties, and we will not be liable for any loss or damage caused by the use of such third-party websites, services, or applications. The inclusion of a link to a third-party website, service, or application does not imply an endorsement by us. We cannot guarantee the safety and privacy of data you provide to any third parties. Any data collected by third parties is not covered by this privacy notice. We are not responsible for the content or privacy and security practices and policies of any third parties, including other websites, services, or applications that may be linked to or from the Services. You should review the policies of such third parties and contact them directly to respond to your questions.

6. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

Summary: *We may use cookies and other tracking technologies to collect and store your information.*

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Notice.

7. HOW DO WE HANDLE YOUR SOCIAL LOGINS?

Summary: *If you choose to register or log in to our Services using an external account, we may have access to certain information about you.*

Our Services offer you the ability to register and log in using your third-party email or social media account details (like your Google, Microsoft, Facebook, Github, or X logins). Where you choose to do this, we will receive certain profile information about you from your social media provider. The profile information we receive may vary depending on the social media provider concerned, but will often include your name, email address, friends list, and profile picture, as well as other information you choose to make public on such a social media platform.

We will use the information we receive only for the purposes that are described in this privacy notice or that are otherwise made clear to you on the relevant Services. Please note that we do not control, and are not responsible for, other uses of your personal

information by your third-party social media provider. We recommend that you review their privacy notice to understand how they collect, use, and share your personal information, and how you can set your privacy preferences on their sites and apps.

8. IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?

Summary: *We may transfer, store, and process your information in countries other than your own.*

Some of our servers are located in the United States. If you are accessing our Services from outside the United States, please be aware that your information may be transferred to, stored, and processed by us in our facilities and by those third parties in the United States, and other countries.

If you are a resident of the European Economic Area (EEA), United Kingdom (UK), or Switzerland, then these countries may not necessarily have data protection laws or other similar laws as comprehensive as those in your country. However, we will take all necessary measures to protect your personal information in accordance with this privacy notice and applicable law.

European Commission's Standard Contractual Clauses:

We have implemented measures to protect your personal information, including by using the European Commission's Standard Contractual Clauses for transfers of personal information between our group companies and between us and our third-party providers. These clauses require all recipients to protect all personal information that they process originating from the EEA or UK in accordance with European data protection laws and regulations. Our Standard Contractual Clauses are provided upon request. We have implemented similar appropriate safeguards with our third-party service providers and partners and further details can be provided upon request.

9. HOW LONG DO WE KEEP YOUR INFORMATION?

Summary: *We keep your information for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law.*

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in

this notice will require us to keep your personal information for longer than twelve (12) months past the termination of the user's account.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, 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.

10. HOW DO WE KEEP YOUR INFORMATION SAFE?

Summary: *We aim to protect your personal information through a system of organizational and technical security measures.*

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

11. WHAT ARE YOUR PRIVACY RIGHTS?

Summary: *In some regions, such as the European Economic Area (EEA), United Kingdom (UK), Switzerland, and Canada, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.*

In some regions (like the EEA, UK, Switzerland, and Canada), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; (vi) if applicable, to data portability; and (vii) not to be subject to automated decision-making. In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us using the contact details provided in the section "HOW CAN YOU CONTACT US?" below.

We will consider and act upon any request in accordance with applicable data protection laws.

If you are located in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your Member State data protection authority or UK data protection authority.

If you are located in Switzerland, you may contact the Federal Data Protection and Information Commissioner.

Withdrawing your consent: If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section "HOW CAN YOU CONTACT US?" below.

However, please note that this will not affect the lawfulness of the processing before its withdrawal, nor when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

Opting out of marketing and promotional communications: You can unsubscribe from our marketing and promotional communications at any time by clicking on the unsubscribe link in the emails that we send, replying "STOP" or "UNSUBSCRIBE" to the SMS messages that we send, or by contacting us using the details provided in the section "HOW CAN YOU CONTACT US?" below. You will then be removed from the marketing lists. However, we may still communicate with you — for example, to send you service-related messages that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes.

Account Information

If you would at any time like to review or change the information in your account or terminate your account, you can:

- Log in to your account settings and update your user account.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, and enforce our legal terms and/or comply with applicable legal requirements.

Cookies and similar technologies: Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services. You may also opt out of interest-based advertising by advertisers on our Services.

If you have questions or comments about your privacy rights, you may email us at legal@joinadvisorai.com

12. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

13. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

Summary: *Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information.*

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with Services, you have the right to request the removal of unwanted data that you publicly post on the Services. To request removal of such data, please contact us using the contact information provided below and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Services, but please be aware that the data may not be completely or comprehensively removed from all our systems (e.g., backups, etc.).

14. DO WE MAKE UPDATES TO THIS NOTICE?

Summary: *Yes, we will update this notice as necessary to stay compliant with relevant laws.*

We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

15. HOW CAN YOU CONTACT US?

If you have questions or comments about this notice, you may contact our Data Protection Officer (DPO) by email at legal@joinadvisorai.com, or contact us by post at:

Advisor.AI Inc.
345 California St., Suite 600
San Francisco, CA 94103

16. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Based on the applicable laws of your country, you may have the right to request access to, modification of, or deletion of the personal information we collect from you. To exercise these rights, please send an email to legal@joinadvisorai.com