

Last Revised: 11/27/2020

REDCHIRP™ PLATFORM PRIVACY POLICY

RedChirp, LLC (collectively with its subsidiaries, “RedChirp,” “Company,” “we,” “us,” and “our,”) respects your privacy and is committed to protecting your privacy through our compliance with this Platform Privacy Policy (the “Policy”). This Policy should be read in conjunction with our [Platform Terms of Use](#) and [Authorized User Agreement](#) into which this Policy is incorporated by reference.

This Policy describes:

- The types of information we collect from you or that you may provide when you visit our website available at <https://redchirp.com/>, or use the RedChirp software application Platform (collectively, our “Platform”).
- Our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Policy applies to information we collect on this Platform or in emails and other electronic messages between you and this Platform, and information gathered when you interact with our advertising on third-party websites if such advertisements include links to this Policy.

Please read this Policy carefully to understand our practices regarding your information and how we will treat it. If you do not agree with our policies and practices, then please do not use our Platform. By using our Platform, you agree to the terms of this Policy. This Policy may change from time to time (see below, “Changes to this Policy”). Your continued use of our Platform after we make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.

What We Collect and How We Collect It

To ensure that we provide you with the best possible experience, we will store, use, and share information about you in accordance with this Policy.

Information You Provide to Us

Personal Information is any information that can be used to individually identify you from a larger group, such as data including, but not limited to, your:

- first and last name;
- email address;
- telephone number;
- age;
- image/likeness through live and pre-recorded video;
- credit card and payment information;
- mailing address;
- real-time location; and
- comments or messages provided in free text boxes.

You may provide us Personal Information when you:

- request information;
- schedule a demonstration;
- subscribe to our emails; and
- register yourself with the Platform.

The information that you provide in each case will vary. In some cases, you may be able to provide Personal Information via text/SMS messages, email or free text boxes, such as contacting RedChirp to request further information or interacting with a ChatBot or Bot Assistant. When providing your Personal Information, please provide only relevant information and do not provide unnecessary sensitive information, such as Social Security numbers or other sensitive personal data. Additionally, we may ask you to create a username and password that should only be known to you.

Sharing with Organizations: Please note that by interacting with the Platform, you will also be sharing your Personal Information with the business or company that you have a relationship with through the Platform (“Organization”). As such, any Personal Information you share with RedChirp will also be shared with the Organization, and some information that you share with Organization through the Platform will be unavailable to RedChirp. For example, any payment information, such as credit card information, you use to transact with Organization will be unavailable to RedChirp and instead processed and stored by Organization or its trusted third-party payment processors.

Automated Information Collection

In addition to the information that you provide to us, we may also collect information about you during your visit to our Platform. We collect this information using automated tools that are detailed below. These tools may collect information about your behavior and your computer system, such as your internet address (IP Address), the pages you have viewed, and the actions you have taken while using the Platform. Some of the tools we use to automatically collect information about you may include:

- (a) Cookies. A “cookie” is a small data file transmitted from a website to your device’s hard drive. Cookies are usually defined in one of two ways, and we may use either (or both) of them:

- (1) session cookies, which do not stay on your device after you close your browser, and
- (2) persistent cookies, which remain on your device until you delete them or they expire.

Of course, if you do not wish to have cookies on your devices, you may turn them off at any time by modifying your internet browser’s settings. However, by disabling cookies on your device, you may be prohibited from full use of the Platform’s features or lose access to some functionality. Also, disabling cookies will not stop certain other collection technologies (like HTML5 – see below).

- (b) Google Analytics. The Platform sends aggregated, non-Personal Information to Google Analytics for the purpose of providing us with the ability to conduct technical and statistical analysis on the Platform’s performance. For more information on how Google Analytics supports the Platform and uses information sent from the Platform, please review Google’s privacy policy available at <https://policies.google.com/technologies/partner-sites>.

- (c) Web Beacons. A Web Beacon is an electronic image. Web Beacons can track certain things from your computer and can report activity back to a web server allowing us to understand some of your behavior. If you choose to receive emails from us, we may use Web Beacons to track your reaction to our emails. We may also use them to track if you click on the links and at what time and date you do so. Some of the third-party marketers we engage with may use Web Beacons to track your interaction with online advertising banners on our Platform. This information is only collected in aggregate form and will not be linked to your Personal Information. Please note that any image file on a webpage can act as a Web Beacon.
- (d) Embedded Web Links. Links provided in our emails and, in some cases, on third-party websites may include tracking technology embedded in the link. The tracking is accomplished through a redirection system. The redirection system allows us to understand how the link is being used by email recipients. Some of these links will enable us to identify that you have personally clicked on the link and this may be attached to the Personal Information that we hold about you. This data is used to improve our service to you and to help us understand the performance of our marketing campaigns.
- (e) HTML5 and Local Storage. We and our third party providers may use HTML5 to store information locally on your computer or device about your Platform usage activities. This information can be written and retrieved by us and our providers to determine how our Platform is being used, to enable use of the Platform, to assess how our Platform may be improved, and to customize the Platform for you. Some internet browsers allow you to disable HTML5 local storage or delete information contained in HTML5 local storage using browser controls, but you may not be able to control, delete or disable such local storage depending upon your browser.
- (f) Third-party Websites and Services. We work with a number of service providers of marketing communications technology. These service providers may use various data collection methods to improve the performance of the marketing campaigns we are contracting them to provide. The information collected can be gathered on our Platform and also on the websites where our marketing communications are appearing. For example, we may collect data where our banner advertisements are displayed on third-party websites.

Your Choices and Selecting Your Privacy Preferences

We want to provide you with relevant information that you have requested.

If we provide subscription-based services, such as email newsletters, we will allow you to make choices about what information you provide at the point of information collection or at any time after you have received a communication from us while you are subscribed. Transactional or service-oriented messages are usually excluded from such preferences, as such messages are required to respond to your requests or to provide goods and services, and are not intended for the purposes of marketing.

We will not intentionally send you email newsletters and marketing emails unless you consent to receive such marketing information. After you request to receive these emails, you may opt out of them at any time by selecting the “unsubscribe” link at the bottom of each email. Please note that by

opting out or unsubscribing you may affect other services you have requested we provide to you, in which email communication is a requirement of the service provided.

Text Messaging. You may have the opportunity to receive SMS or "text" messages, pre-recorded voice messages or auto-dialed phone calls from RedChirp or Organization, its affiliates and related entities as well as third parties. Such messaging may be used to authenticate your identity or mobile device, as well as provide you informational updates about services or products you may have requested. In providing your mobile device number or cell phone number to the Platform or using a phone number assigned by RedChirp, you knowingly consent to such communications from the Platform or for the Platform to use your cell phone number or mobile device number in accordance with RedChirp's Privacy Policy. In providing your number and accepting these Terms, you represent that you have the authority to agree to receive text messages at the telephone number that you provide to the Platform, or from which you sent the text message request to us. You further acknowledge that no purchase is required to opt into this service, and you may opt out at any time.

To discontinue receiving SMS messages, please contact the Organization sending you text messages to request that they stop.

Any such communications you receive from us will be administered in accordance with your preferences and this Policy.

In providing your mobile device number or cell phone number to the Platform, sending or receiving text messages via the Platform, or using a phone number assigned by RedChirp, you knowingly consent to SMS or "text" messages transmitted or received within the Platform being recorded and stored. You acknowledge that such messages are the data of responsible Organization and will be viewable and processed by Organization and by RedChirp, and you knowingly consent to the same.

Accuracy and Access to Your Personal Information

We strive to maintain and process your information accurately. We have processes in place to maintain all of our information in accordance with relevant data governance frameworks and legal requirements. We employ technologies designed to help us maintain information accuracy on input and processing.

Where we can provide you access to your Personal Information in our possession, we will always ask you for a username and password to help protect your privacy and security. We recommend that you keep your password safe, that you change it periodically, and that you do not disclose it to any other person or allow any other person to use it.

To view and change the Personal Information that you have provided to us, you can log in to your account and follow the instructions on that webpage, or contact us directly for assistance.

Information of Minors

We do not intentionally seek to gather information from individuals under the age of sixteen (16). We do not target the Platform to minors, and would not expect them to be engaging with our Platform or services. We encourage parents and guardians to provide adequate protection measures to prevent minors from providing information unwillingly on the internet. If we are aware of any Personal Information that we have collected about minors, we will take steps to securely remove it from our systems.

How We Use Your Information

The information we gather and that you provide is collected to provide you information and the services you request, in addition to various other purposes, including, but not limited to:

- Assisting you with items such as personalized experiences, facilitation of product usage, and enforcement of Terms of Use.
- Preventing malicious activity and providing you with a secure experience.
- Providing service and support for services you request.
- Providing marketing communications that are effective and optimized for you.
- Keeping you up-to-date with the latest benefits available from us.
- Preventing unwanted messages or content.
- Promoting our marketing programs and campaigns.
- Measuring the performance of our marketing programs.
- Contacting you about services and offers that are relevant to you.

By providing us with your Personal Information, you consent to RedChirp's use of that Personal Information in our marketing programs and campaigns.

How We Share Your Information

We do not sell or lease your information to any third party. We may disclose your Personal Information to our trusted third-party business partners in accordance with this Policy. We work with a number of partners that help us process your requests, deliver customer service and support, send email marketing communications, and provide experiences that you have come to expect from us. We will share your Personal Information with these third parties in order to fulfill the service that they provide to us. These third-party partners are under contract to keep your Personal Information secure and not to use it for any reason other than to fulfill the service we have requested from them.

Except as described in this Policy, we will not share your information with third parties without your notice and consent, unless it is under one of the following circumstances:

- Responding to duly authorized information requests from law enforcement or other governmental authorities.
- Complying with any law, regulations, subpoena, or court order.
- Investigating and helping prevent security threats, fraud, or other malicious activity.
- Enforcing or protecting the rights and properties of RedChirp or its subsidiaries.
- Protecting the rights or personal safety of RedChirp's employees.

There are circumstances where RedChirp may decide to buy, sell, or reorganize its business in selected countries. Under these circumstances, it may be necessary to share or receive Personal Information with prospective or actual partners or affiliates. In such circumstances, RedChirp will ensure your information is used in accordance with this Policy.

Third-party Websites

This Policy does not apply to websites or other domains that are maintained or operated by third parties or our affiliates. Our Platform may link to third-party websites and services, but these links are not endorsements of these sites, and this Policy does not extend to them. Because this Policy is not enforced on these third-party websites, we encourage you to read any posted privacy policy of the third-party website before using the service or site and providing any information.

Your California Rights

Pursuant to California Civil Code Section 1798.83, we will not disclose or share your Personal Information with third parties for the purposes of third-party marketing to you without your prior consent.

Other than as disclosed in this Policy, the Platform does not track users over time and across third-party websites to provide targeted advertising. Therefore, the Platform does not operate any differently when it receives Do Not Track (“DNT”) signals from your internet web browser.

If you are a California consumer, as defined by the California Consumer Privacy Act of 2018, you may be afforded additional rights with respect to your “Personal Information” as that term is explicitly defined under California law. Any Personal Information we collect is collected for the commercial purpose of effectively providing our services to you, as well as enabling you to learn more about, and benefit from, our services. You may exercise each of your rights as identified below, subject to our verification of your identity.

Access. You may email us at legal@redchirp.com to request a copy of the Personal Information our Platform databases currently contain.

Prohibit Data Sharing. When applicable, you may prohibit the sharing of your Personal Information by submitting a request via email to legal@redchirp.com. In your email, please explain how you wish us to prohibit the sharing of your Personal Information, and which categories of third parties you want to prohibit from receiving your Personal Information. When such prohibitions are not possible to provide our services to you, we will advise you accordingly. You can then choose to exercise any other rights under this Policy.

Portability. Upon request and when possible, we can provide you with copies of your Personal Information. You may submit a request via email to legal@redchirp.com. When such a request cannot be honored, we will advise you accordingly. You can then choose to exercise any other rights under this Policy.

Deletion. If you should wish to cease use of our Platform and have your Personal Information deleted from our Platform, then you may submit a request by emailing us at legal@redchirp.com. Upon receipt of such a request for deletion, we will confirm receipt and will confirm once your Personal Information has been deleted. Where applicable, we will ensure such changes are shared with trusted third parties.

In addition to the email address provided above, you may also submit requests at the following toll-free telephone number: (844) 817-5832

We do not sell your Personal Information. If we ever decide to sell Personal Information, we will update you via this Policy and include a link entitled “Do Not Sell My Personal Information,” to provide you with an opportunity to opt out of sales of your Personal Information.

If a California resident exercises his or her rights under California law, including the CCPA, we shall not discriminate against that California resident by denying our goods or services, charging different prices or rates to similarly situated consumers, providing a different level or quality of our goods or services, or taking any other adverse action.

For Platform Visitors Outside of the United States

Our Platform is designed for use by individuals in the United States only. We do not warrant or represent this Policy or the Platform’s use of your Personal Information complies with the laws of any other jurisdiction. Furthermore, to provide you with our services, we may store, process, and transmit information in the United States and other locations around the world, including countries that may

not have the same privacy and security laws as yours. Regardless of the country in which such information is stored, we will process your Personal Information in accordance with this Policy.

Changes to this Policy

If we make any changes to this Policy, a revised Policy will be posted on this webpage and the date of the change will be reported in the “Last Revised” block above. You can get to this page from any of our webpages by clicking on the “Privacy Policy” link (usually at the bottom of the screen).

Safeguarding the Information We Collect

We use reasonable technical, administrative, and physical safeguards in order to protect your Personal Information against accidental loss and from unauthorized access, use, alteration, and disclosure. However, we can never promise 100% security. You have a responsibility, as well, to safeguard your information through the proper use and security of any online credentials used to access your Personal Information, such as a username and password. If you believe your credentials have been compromised, please change your password. Please also notify us of any unauthorized use.

How to Contact Us

We value your opinions and welcome your feedback. To contact us about this Policy or your Personal Information, please contact us using our online form at <https://redchirp.com/contact-us/>.