

Reffer.ai Privacy Policy

In order to ensure transparency and give you more control over your Personal Information, this privacy policy (“**Privacy Policy**”) governs how we, Reffer LTD. (together, “**reffer.ai**” “**we**”, “**our**” or “**us**”) use, collect and store Personal Data we collect or receive from or about you (“**you**”) such as in the following use cases:

- When you make use of, or interact with, our websites <https://reffer.ai/> (“**Website(s)**”)
 1. When you contact us (e.g. customer support, need help, submit a request)
 2. When you subscribe to our distribution list(s) / newsletter(s)
- When you make use of, or interact with, our Reffer.ai Browser Extension/Application tool
- When you download and make use of the Tool
 1. When you contact us
- When you interact with us on our social media profiles (e.g., Facebook, Instagram, Twitter, LinkedIn)

We greatly respect your privacy, which is why we make every effort to provide a platform that would live up to the highest of user privacy standards. Please read this Privacy Policy carefully, so you can fully understand our practices and your rights in relation to personal data. “**Personal Data**” or “**Personal Information**” means any information that can be used, alone or together with other data, to uniquely identify any living human being. Please note that some provisions only apply to individuals in certain jurisdictions.

Important note: Nothing in this Privacy Policy is intended to limit in any way your statutory right, including your rights to a remedy or means of enforcement.

This Privacy Policy can be updated from time to time and, therefore, we ask you to check back periodically for the latest version of this Privacy Policy. If we implement significant changes to the use of your Personal Data in a manner different from that stated at the time of collection, we will notify you by posting a notice on our Website or by other means.

1. What information we collect, why we collect it, and how it is used

Personal Data

Why is the Personal Data collected and for what purposes?

Legal basis (GDPR only, if applicable)

Third parties with whom we share your Personal Data

Consequences of not providing the Personal Data

1.1. When you make use of, or interact with, our Websites

Cookies and other tracking technologies.

- To review or improve the usage and operations of our Website
- To analyze trends
- To administer the Website
- To track users' movement around the Website

Legitimate interest

Cookie and analytic tools and vendors:

- Google Analytics (analytics)
- Amplitude (analytics)
- Facebook (social media channel)
- Twitter (social media channel)
- LinkedIn (social media channel)
- Quora (social media channel)

Certain non-essential Website features may not be available

1.1.1. When you contact us (e.g. customer support, need help, submit a request)

- Full name
- Email address
- Message
- To process and answer questions
- To provide support (e.g., to solve problems, bugs or issues)

Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

Legitimate interest (e.g. respond to your request).

Email platforms (Gmail)

Cannot process and answer questions

Cannot provide support (e.g., to solve problems, bugs or issues)

1.1.2. When you subscribe to our distribution list(s) / newsletter(s)

- Full name
- Email address
- To add you to our mailing list
- To send newsletters or other marketing communications
- Legitimate interest (e.g. to send you marketing communications) Consent (in some contexts) 3rd party platforms such as for the following purposes:
 - Mailchimp (email distribution)
 - Sparkpost (email distribution)
 - Wix (web hosting)
 - Webflow (web hosting)
- Cannot add you to our mailing list
- Cannot send you marketing communications

1.2. When you make use of, or interact with the Tool and/or App (including, without limitation, the document summarization service)

1.2.1. When download and make use of the Tool and/or App

- User name and email address (optional)
- IP address
- Device information
- To allow you to sign-up
- To provide you with the Tool
- To optimize the results of the Tool for you
- To customize the services to you
- To improve our services and the Tool
- To be able to attribute the sign-up to you

Processing is necessary for the performance of a contract to which the data subject is party (EULA available on <https://dashboard.reffer.ai/files/documents/PLATFORM%20TERMS%20AND%20CONDITIONS.pdf>) or in order to take steps at the request of the data subject prior to entering into a contract.

Legitimate interest (e.g. to provide you with the Tool).

3rd party platforms such as for the following purposes:

- Google (Cloud Platform, storage)
- Amplitude (analytics)
- Sparkpost (email distribution)
- MailChimp (email distribution)
- Singular (Mobile measure partner)
- Payment details
- For processing payments and payment purposes
- To be able to attribute the payment to you

Processing is necessary for the performance of a contract to which the data subject is party (EULA) or in order to take steps at the request of the data subject prior to entering into a contract.

Legitimate interest (e.g. to provide you with the Tool).

- Stripe (payment)
- Apple App Store (payments relating to the App)
- Singular (Mobile measure partner)
- User content (including text, documents, or other content or information uploaded, entered, or otherwise transmitted by you in connection with your use of the Tool)
- To provide you with the Tool
- To optimize the results of the Tool for you
- To customize the services to you
- To improve our services and the Tool

Processing is necessary for the performance of a contract to which the data subject is party (EULA).

Legitimate interest

- Google (Cloud Platform, storage)
- User usage (including, data collected using cookies and other technologies relating to, for example, the time you spend on each page of the Tool and/or App, which links you click on in the Tool and/or App, which features you like or dislike on the Tool and/or App. Other information collected may include your device's IP address, device screen size, device type, browser information, geographic location (country only), and the preferred language used to display the Tool.)
- To provide you with the Tool
- To optimize the results of the Tool for you
- To customize the services to you
- To improve our services and the Tool
- To monitor and better understand your use of the Tool using your feedback

Processing is necessary for the performance of a contract to which the data subject is party (EULA).

Legitimate interest

- Google (Cloud Platform, storage)
- Amplitude (analytics)
- Hotjar (analytics)

1.2.2. When you contact us (e.g. customer support, need help, submit a request)

- Full name
- Email address
- Message
- Any other information that you decide to provide/supply us with
- To process and answer questions
- To provide support (e.g., to solve problems, bugs or issues)

Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract. Legitimate interest (e.g. respond to your request).

- Email platforms (Gmail)

Cannot process and answer questions Cannot provide support (e.g., to solve problems, bugs or issues)

1.3. When you interact with us on our social media profiles (e.g., Facebook, Instagram, Twitter, LinkedIn)

- Full name
- Email address
- Company name

- Job position
- Any other information that you decide to provide/supply us with
- To answer your questions
- To establish a connection or discussion

Depending on the context, legitimate interest (to answer your questions and/or establish a connection) or consent 3rd party platforms such as for the following purposes:

- Facebook (social media channel)
- Instagram (social media channel)
- Twitter (social media channel)
- LinkedIn (social media channel)

Finally, please note that some of the abovementioned Personal Data will be used for detecting, taking steps to prevent, and prosecution of fraud or other illegal activity, to identify and repair errors, to conduct audits, and for security purposes. Personal Data may also be used to comply with applicable laws, with investigations performed by the relevant authorities, law enforcement purposes, and/or to exercise or defend legal claims. In certain cases, we may or will anonymize or de-identify your Personal Data and further use it (for internal and external purposes, including, without limitation, to improve the services and for research purposes). “Anonymous Information” means information which does not enable identification of an individual user, such as aggregated information about the use of our services. We may use Anonymous Information and/or disclose it to third parties without restrictions (for example, in order to improve our services and enhance your experience with them).

2. How we protect and retain your information

2.1. Security. We have implemented appropriate technical, organizational and security measures designed to protect your Personal Data. As the security of information depends in part on the security of the computer, device or network you use to communicate with us and the security you use to protect your user IDs and passwords, please make sure to take appropriate measures to protect this information and items. **2.2. Retention of your Personal Data.** Your Personal Data will be stored until we delete the record and we proactively delete it or you send a valid deletion request. Please note that in some circumstances we may store your Personal Data for longer periods of time, amongst other, (i) where we are required to do so in accordance with legal, regulatory, tax or accounting requirements, (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges, or (iii) if we reasonably believe there is a prospect of litigation relating to your Personal Data or dealings.

3. How we share your personal data

In addition to the recipients described above, we may share your Personal Data as follows: 3.1. With our corporate affiliates (e.g. parent and subsidiaries within our group) and/or partners; 3.2. To the extent necessary, with regulators, courts or competent authorities, to comply with applicable laws, regulations and rules (including, without limitation, federal, state or local laws), and requests of law enforcement, regulatory and other governmental agencies or if required to do so by court order; 3.3. If, in the future, we sell or transfer, or we consider selling or transferring, some or all of our business, shares or assets to a third party, we will disclose your Personal Data to such third party (whether actual or potential) in connection with the foregoing events; 3.4. In the event that we are acquired by, or merged with, a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer, disclose or assign your Personal Data in connection with the foregoing events, including, in connection with, or during negotiations of, any merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or to another company; and/or 3.5. Where you have provided your consent to us sharing or transferring your Personal Data (e.g., where you provide us with marketing consents or opt-in to optional additional services or functionality).

4. Additional information regarding transfers of personal data

4.1. Where we transfer your Personal Data outside of EU/EEA (for example to third parties who provide us with services), we will obtain contractual commitments from them to protect your Personal Data.

5. Your privacy rights. How to delete your account

5.1 Rights: The following rights (which may be subject to certain exemptions or derogations) shall apply to certain individuals (some of which only apply to individuals protected by the GDPR):

- You have a right to access Personal Data held about you. Your right of access may normally be exercised free of charge, however we reserve the right to charge an appropriate administrative fee where permitted by applicable law;
- You have the right to request that we rectify any Personal Data we hold that is inaccurate or misleading;
- You have the right to request the erasure/deletion of your Personal Data (e.g. from our records). Please note that there may be circumstances in which we are required to retain your Personal Data, for example for the establishment, exercise or defense of legal claims;
- You have the right to object, to or to request restriction, of the processing;
- You have the right to data portability. This means that you may have the right to receive your Personal Data in a structured, commonly used and machine-readable format, and that you have the right to transmit that data to another controller;
- You have the right to object to profiling;

- You have the right to withdraw your consent at any time. Please note that there may be circumstances in which we are entitled to continue processing your data, in particular if the processing is required to meet our legal and regulatory obligations. Also, please note that the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal;
- You also have a right to request certain details of the basis on which your Personal Data is transferred outside the European Economic Area, but data transfer agreements and/or other details may need to be partially redacted for reasons of commercial confidentiality; and
- You have a right to lodge a complaint with your local data protection supervisory authority (i.e., your place of habitual residence, place or work or place of alleged infringement) at any time or before the relevant institutions in your place of residence. We ask that you please attempt to resolve any issues with us before you contact your local supervisory authority and/or relevant institution.

5.2 You can exercise your rights by contacting us at support@reffer.ai. You may use an authorized agent to submit a request on your behalf if you provide the authorized agent written permission signed by you. To protect your privacy, we may take steps to verify your identity before fulfilling your request. Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly in accordance with applicable law or inform you if we require further information in order to fulfill your request. When processing your request, we may ask you for additional information to confirm or verify your identity and for security purposes, before processing and/or honoring your request. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive. In the event that your request would adversely affect the rights and freedoms of others (for example, would impact the duty of confidentiality we owe to others) or if we are legally entitled to deal with your request in a different way than initially requested, we will address your request to the maximum extent possible, all in accordance with applicable law.

6. Use by Children

We do not intentionally collect data from children under the age of eighteen (18) years. If you believe that we might have any such information, please contact us at support@reffer.ai. Regardless, in the event that we become aware that you provide Personal Data in violation of applicable privacy laws, we reserve the right to delete it.

7. Interaction with third party products by children

We enable you to interact with third party websites, mobile software applications and products or services that are not owned or controlled by us (each a “**Third Party Service**”). We are not responsible for the privacy practices or the content of such Third Party Services. Please be aware that Third Party Services can collect Personal

Data from you. Accordingly, we encourage you to read the terms and conditions and privacy policies of each Third Party Service.

8. Log files and information collected automatically

We use log files. We use such information to analyze trends, administer the Website, track users' movement around the Website, and gather demographic information.

9. Analytic tools

- **Google Analytics.** The Website uses a tool called “**Google Analytics**” to collect information about use of the Website. Google Analytics collects information such as how often users visit this Website, what pages they visit when they do so, and what other websites they used prior to coming to this Website. We use the information we get from Google Analytics to maintain and improve the Website and our products. We do not combine the information collected through the use of Google Analytics with Personal Information we collect. Google’s ability to use and share information collected by Google Analytics about your visits to this Website is restricted by the Google Analytics Terms of Service, available at <https://marketingplatform.google.com/about/analytics/terms/us/>, and the Google Privacy Policy, available at <https://www.google.com/policies/privacy/>. You may learn more about how Google collects and processes data specifically in connection with Google Analytics at <https://www.google.com/policies/privacy/partners/>. You may prevent your data from being used by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout/>.
- **Facebook Pixels and SDKs.** We use Facebook pixels or SDKs, which are tools that provide help to website owners and publishers, developers, advertisers, business partners (and their customers) and others integrate, use and exchange information with Facebook, as such the collection and use of information for ad targeting. Please note that third parties, including Facebook, use cookies, web beacons, and other storage technologies to collect or receive information from your websites and elsewhere on the internet and use that information to provide measurement services and target ads. Facebook’s ability to use and share information is governed by the Facebook Tools Terms, available at: https://www.facebook.com/legal/technology_terms/. You can prevent your data from being used by Facebook Pixels and SDKs by exercising your choice through these mechanisms: <https://www.aboutads.info/choices> or <https://www.youronlinechoices.eu/>.
- **Facebook Custom Audience, Lookalike Audience, Amplitude** (used in the context of our Tool), **Braze, Intercom**
- **Hotjar.** The App uses Hotjar in order to better understand our users’ needs and to optimize this service and experience. Hotjar is a technology service that helps us better understand our users experience (e.g. how much time

they spend on which pages, which links they choose to click, what users do and don't like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users' behavior and their devices. This includes a device's IP address (processed during your session and stored in a de-identified form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), and the preferred language used to display our App. Hotjar stores this information in a pseudonymized user profile. For further details, please see Hotjar's privacy policy at <https://www.hotjar.com/legal/policies/privacy>. You can opt-out to the creation of a user profile, Hotjar's storing of data about your usage of our Website and Hotjar's use of tracking cookies on other websites on this link <https://www.hotjar.com/legal/compliance/opt-out>.

- **Inspectlet.** We have engaged Inspectlet to analyze the activities of visitors to this Website, and Inspectlet's authorized use of cookies and other tracking technologies enable it to have access to Personal Information of visitors to this website. Such access to and use of Personal Information by Inspectlet is governed by Inspectlet's Privacy Policy.
- **YouTube API.** Our Website and Tool uses YouTube API to collect and process the captions of YouTube's videos, as requested by you. We do not intend to collect or share any Personal Data with YouTube via the API. For further details please see the YouTube's Terms of Service at <https://www.youtube.com/t/terms> and the Google privacy policy at <http://www.google.com/policies/privacy>.
- **Singular.** Singular provides unified marketing data, intelligent insights, and automation services which aim to enable businesses to administer, measure and monitor their activities. For further information, please see the Terms and Conditions at <https://www.singular.net/terms/>, and their Privacy Policy available at <https://www.singular.net/privacy-policy/>.
- We reserve the right to remove or add new analytic tools.

10. Specific provisions applicable under California privacy law

10.1. California Privacy Rights: California Civil Code Section 1798.83 permits our customers who are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please send an email to support@reffer.ai. Please note that we are only required to respond to one request per customer each year.

10.2. Our California Do Not Track Notice (Shine the Light): Do Not Track ("DNT") is a privacy preference that users can set in certain web browsers. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.

10.3. Deletion Of Content From California Residents: If you are a California resident under the age of 18 and a registered user, California Business and Professions Code Section 22581 permits you to remove content or Personal

Information you have publicly posted. To remove, please send an email to support@reffer.ai. Please be aware that after removal you will not be able to restore removed content. In addition, such removal does not ensure complete or comprehensive removal of the content or Personal Information you have posted and that there may be circumstances in which the law does not require us to enable removal of content

11. Contact Us

If you have any questions, concerns or complaints regarding our compliance with this notice and the data protection laws, or if you wish to exercise your rights, we encourage you to first contact us at support@reffer.ai.

Last Updated: March 7, 2024