## **PRIVACY POLICY**

Welcome to Samplead, a generative AI sales platform developed and operated by Antword Inc. ("Antword" or "we", "us", "our") that offers unique prospecting & personalization at scale (the "Platform") to locate, target and create tailored messages for potential leads ("Prospect(s)"). The Platform is accessible through our <a href="https://samplead.co/">https://samplead.co/</a> websites, which also includes content and information about our technology and products (the "Website") (collectively, the "Service").

This Privacy Policy (the "Policy") explains how information about you ("Business", "You", "User") and your Prospects is collected and processed by us.

We do not knowingly collect or process Information on EU individuals, as our Service is intended for US individuals only.

## **PERSONAL DATA PROCESSED**

# We collect and process information you provide us when you register directly to our Service and through a Third Party Provider account

We collect and process your full name and email address when you register directly to our Service. When you register or log in to our Service through third party providers, such as LinkedIn ("Third Party Provider(s)"), we collect and process your full name, Third Party Provider account email address and password, User ID, profile photo, contacts and messages, all as available through your Third Party Provider account. You will also be asked to provide us with your chosen City and State of interest for the provision of the Service.

We refer to this as "Registration Information".

## We collect and process the content you provide to the Service, such as questionnaires and lists of Prospects

We collect and process the content you provide to the Service, including as part of your short onboarding process, such as the Questionnaires you fill for Identifying your target audience, and list of example leads from your CRM, that may include publicly available information such as their names, job titles, email and LinkedIn profile links, all related to their business or profession.

We refer to this as "Your Content".

Please use discretion when providing content that includes personal information of you or others. YOU ARE SOLELY LIABLE FOR PROTECTING THIRD PARTIES' AND YOUR OWN PRIVACY, AND FOR OBTAINING THE PRIOR CONSENT OF INDIVIDUALS' WHOSE PERSONAL INFORMATION IS INCLUDED IN YOUR CONTENT. WE WILL NOT BEAR LIABILITY FOR ANY DAMAGES THAT MIGHT INCUR YOU OR TO THIRD PARTIES AS A RESULT OF THE PROCESSING OF PERSONAL INFORMATION.

#### We collect and process your Payment Information

When you make a payment on the Service using payment processors like Stripe ("Payment Processors"), for example, to subscribe to our Service, we receive basic billing and payment information from the Payment Processors including your full name and billing address. However, we do not receive your credit card information.

We refer to this as "Payment Information".

## We will process User inquiries you choose to send us

You can submit an inquiry through our contact form, by emailing us and by calling us. We will collect the information you provide in the inquiry, which typically includes your full name, phone number, email address, company name and the text of your message.

We refer to this as "Inquiry Information".

# We will process the feedback you provide us with

You can provide us with feedback and troubleshooting information, by sending an e-mail to any of our designated addresses, or any other form of communication we support through our Service. We will process the data you choose to provide, which may include your full name, phone number, email address, company name and the feedback you provide.

We refer to this as "Feedback".

You do not have a legal obligation to let us process any of the above information. However, you will not be able to use the Platform or contact us unless we process this information, because we require it to provide you with the Service and to answer your inquiry.

## We collect and process measurements regarding your use of the Service

We record and collect certain information about your interaction with the Service, including the IP address from which you access the Service, time and date of access, type of browser used, language used, links clicked, and actions taken while using the Service, through Google Analytics and as well as our own internal event tracking system.

We refer to this entire data as "Analytics Information".

#### We collect and process publicly available information about potential Prospects

If you choose to use our Service, we may perform a background check on potential leads. This is done based on publicly available information we may find online, such as their posts and publications on social media (e.g., LinkedIn, Tweeter, Google), the Publicly available information we purchase from third party providers, such as Proxycurl.com and the publicly available information you provide to the Service (and if the information is about individual residing in Vermont – only is it relates to their business or profession).

We refer to this entire data as "Prospects Information".

## **HOW YOUR PERSONAL DATA IS USED**

# We will process your information and the Prospects Information to provide you with the functionality of the Service and the Prospects Inferences

We will collect and process your Registration Information, Your Content, the Prospects Information and Analytics Information in order to provide you the functionality of the Service, which includes processing the Prospects Information on your behalf to locate, target and create tailored messages for potential leads personalized to you based on their Inferences, such as Behaviors, Characteristics, Abilities etc. ("Inferences")

#### We will process your Payment Information to provide you with access to our Service

We process your Payment Information when you pay our subscription fee through our Payment Processors to access our Service.

#### We will use your Inquiry Information to handle and respond to your inquiry

We will use your Inquiry Information to contact you about your inquiry and handle and respond to it. If your inquiry is regarding any other information we have about you, we will process that other information to respond to your inquiry.

# We use the Analytics Information, Feedback and the Prospects Information for developing and enhancing the Service, and for providing the Prospects Information to others

We process the Analytics Information, Feedback and the Prospects Information to assess the Service performance, maintain and improve the Service, for quality assurance, for development and enhancement of the Service and for providing the Prospects Information to other Users.

# We use the Analytics Information and Feedback to prevent fraud, resolve disputes, and troubleshoot problems and related purposes

We will use the Analytics Information and Feedback to prevent fraud and abuse, resolve disputes, troubleshoot problems, assist with any investigations, and enforce our Terms of Service.

## We will use your email address to contact you with administrative messages relating to the Service

We will use your email address to contact you regarding administrative issues related to the Services, this Policy, our Terms of Service, support and maintenance.

#### We will use the information to enforce this Policy and to comply with applicable law and judicial orders

We will use the information we collect to prevent fraud, resolve disputes, troubleshoot problems, assist with any investigations, enforce this Policy and take other actions otherwise permitted by law.

#### WHOM WE SHARE YOUR DATA WITH

We will not share your information with third parties, except in the events listed below or when you provide us with your explicit and informed consent. These are also the categories of third parties with whom Antword has disclosed personal information in the preceding 12 months.

#### We will process information with our service providers helping us to operate the Service

We will process your Information with the assistance of our service providers, such as Google, Amazon and Stripe.

These companies are authorized to use your personal information in this context only as necessary to provide you with the Service and not for their own business purposes.

#### If you make a subscription and pay using Payment Processors, we will share your information with them

We will share your full name, email address and billing address with Payment Processors, such as Stripe, in the course of your use of their payment services.

# We will share information with competent authorities, if you abuse the rights to use the Service, or violate any applicable law

If you have abused your rights to use the Service, or violated any applicable law, we will share information with competent authorities and with third parties (such as legal counsels and advisors), for the purpose of handling of the violation or breach.

#### We will share information if we are legally required to do so

We will share information if we are required to do so by a judicial, governmental or regulatory authority.

#### We will share your Information with third parties in any event of change in our structure

If the operation of our business is organized within a different framework, or through another legal structure or entity (such as due to a merger or acquisition), we will share information only as required to enable the structural change in the operation of the business.

### We do not sell or share your personal information

We do not sell or share your personal information for cross-context behavioral advertising, nor have we done so in the past 12 months.

#### **COOKIES AND OTHER TRACKERS**

We use various types of cookies and other types of trackers, which help us to administer and operate the Service. These trackers are mainly used to develop and enhance the Service, and to learn marketing effectiveness, as explained above.

If you wish to block cookies, you may do so through your browser's settings. You can delete cookies that are already on your browser, and you can set your browser to prevent them from being placed going forward. Please refer to the browser's help menu for further information. Please also bear in mind that disabling cookies may adversely affect your User experience on the Service.

For more information about Google cookies, click <u>here</u>. For information about opting-out of Google cookies, click <u>here</u>. For more information about Facebook cookies, and about opting-out, click <u>here</u>.

#### **SECURITY AND DATA RETENTION**

# We will retain your Information for as long as we need it for business purposes, and thereafter as needed for record-keeping matters

We will retain your Information for the duration needed to support our ordinary business activities operating the Service. Thereafter, we will still retain it as necessary to comply with our legal obligations, resolve disputes, establish and defend legal claims and enforce our agreements.

# We implement measures to secure your information

We implement some measures to reduce the risks of damage, loss of information and unauthorized access or use of information, such as SSL and AWS S3 backup. In any event, these measures do not provide absolute information security. Therefore, although efforts are made to secure personal information, it is not guaranteed, and you cannot expect that the Service will be immune from information security risks.

#### **INTERNATIONAL DATA TRANSFERS**

We will internationally transfer information in accordance with applicable data protection laws

If we transfer your personal data for processing at locations outside your jurisdiction, we will abide by data transfer rules applicable to these situations.

### ADDITIONAL INFORMATION FOR INDIVIDUALS IN CALIFORNIA

Below is a detailed description of the information we collect from Users of our Service and the business or commercial purposes for which we use each category of personal information. This is also the information we have collected in the past 12 months.

Categories of personal information and source from which the information is collected	Specific Types of Personal Information Collected	Business or commercial purposes pursuant to the CPRA	Specific purposes
Identifiers such as a full name, online identifier, internet protocol address, email address and account name – collected directly from you, provided by Customer and from Customer's use of the Service	As described above in the "Personal Data Processed" section.	processing of fulfilling of dets, providing advertising or marketing services, providing analytic services, or providing similar services on their behalf.  Undertaking activities to verify	As specified above in the "How Your Personal Data is Used" section.
Audio and visual information, provided by Customer			
Internet or other electronic network activity information, such as information regarding a consumer's interaction with Internet websites and applications, from Customer's use of the Service			
Commercial information, including records of subscribed services, from Customer's use of the Service			
Inferences, such as Behaviors, Characteristics, Abilities of Prospects, processed by Antword from publicly available information we may find online			

# Your rights under the CPRA:

## Disclosure of personal information we collect about you.

You have the right to know:

- The categories of personal information we have collected about you.
- The categories of sources from which the personal information is collected.
- Our business or commercial purpose for collecting personal information.
- The categories of third parties with whom we share personal information, if any.
- The specific pieces of personal information we have collected about you.

### Right to deletion.

Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:

- Delete your personal information from our records; and
- Direct any service providers to delete your personal information from their records.

Please note that we may not delete your personal information if it is necessary to:

• Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service

requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us.

- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity.
- Debug to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act.
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that
  adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to
  render impossible or seriously impair the achievement of such research, provided we have obtained
  your informed consent.
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us.
- Comply with an existing legal obligation.

or

• Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

## **Protection against discrimination**

You have the right to not be discriminated against by us because you exercised any of your rights under the CPRA.

### **Right to correction**

You have the right to request from us correct inaccurate personal information, taking into account the nature of the personal information and the purposes of the processing of the personal information

#### **Exercising your CPRA rights**

If you would like to exercise any of your CPRA rights as described in this Notice, please contact us through the channels indicated in this Policy.

We may ask you for additional information to confirm your identity and for security purposes, before disclosing the personal data requested to you, by using a two or three points of data verification process, depending on the type of information you require.

If you are a Prospect and would like to exercise any of your CPRA rights regarding the Inferences we provide about you, based on your Publicly available information, please note that we are merely a service provider that follows Business' instructions. You should submit the request directly to the Business who contacted you.

# Disclosures to third parties

California Civil Code Section 1798.83 (and other, similar state statutes) permits our customers who are California residents (or residents of states with similar legislation) to request certain information regarding our disclosure of Personal Data to third parties for their direct marketing purposes. To make such a request, please send an email to <a href="mailto:privacy@samplead.co">privacy@samplead.co</a>. Please note that we are only required to respond to one request per customer each year.

### Do Not Track

Our Do Not Track Notice. We do not currently respond or take any action with respect to web browser "do not track" signals or other mechanisms that provide consumers the ability to exercise choice regarding the collection of Personal Data about a User's online activities over time and across third-party web sites or online services. We do allow third parties who provide us with analytics tools, as described in the "Personal Data Processed" Section, to collect Personal Data about a User's online activities when a User uses the Service.

# **MINORS**

## The Service is not directed to Users under 18

The Service is not directed to Users under the age of 18. We do not knowingly collect information or data from

children under the age of 18 or knowingly allow children under the age of 18 to use the Service.

# **CHANGES TO THIS POLICY**

# If we change this Policy, we will make efforts to proactively notify you of such changes

From time to time, we may change this Policy. If we do so, we will make efforts to proactively notify you of such changes. In any event, the latest version of the Policy will always be accessible at [www.samplead.co].

# **CONTACT US**

For any questions about this Policy, you may contact us at <a href="mailto:privacy@samplead.co">privacy@samplead.co</a>.

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