

# Chartable

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## Introduction

Chartable Holding, Inc. (“Chartable”, “Company”, “we” or “us”) is committed to protecting your privacy. The following policy (“Privacy Policy”) describes our practices for collecting, using, maintaining, and disclosing information that we collect from you or that you provide to us when you visit our website (our “Site”) or use any other products and services made available by us (collectively with the Site, the “Services”).

We ask that you read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it. The use of information collected through our Services will be limited to the purposes described under this Privacy Policy and our Terms of Service (or other relevant customer contracts). By accessing or using the Services, you agree to this Privacy Policy. Please be aware that if you are using the Services on behalf of an entity, you are agreeing to this Privacy Policy for that entity and are representing to us that you have the authority to do so (in which case “you” will refer to that entity). If you do not agree with our policies and practices, your choice is not to use the Services.

This Privacy Policy may change from time to time. If we make any changes, we will post the changes on this page and indicate at the top of this page the date the policy was last revised. We will also notify you of any material changes either through a pop-up notice, email or through other reasonable means. Any such changes are effective immediately when we post them, and apply to all access to and use of the Services thereafter. Your continued use of the Services after the date any such changes become effective constitutes your acceptance of the new policy.

## Information We Collect and How We Collect Information

This policy sets out what personal data we might collect, how we process and protect that data and the lawful grounds for that processing. In most cases, the lawful ground will be that the processing: (i) is necessary for our legitimate interests in carrying out our business, including to grow and improve our Services, provided those interests are not outweighed by your rights and interests (“Legitimate Interests”), (ii) is necessary to perform a contract with you (“Contract”), or (iii) we have a legal obligation to carry out the processing (“Legal Obligation”). Where processing is based on your consent (“Consent”), we will identify the processing purposes and provide you with relevant information to make the processing fair and transparent.

### A. Information You Provide.

We may collect information you provide directly via the Services. We may ask you for some or all of the following types of information when you register with our Services, submit comments and other content, order products, or directly contact us with questions or feedback:

- Your name
- Your telephone number
- Your address
- Your employer’s name
- Your job title



- Your email address
- Your password and user information for certain third-party accounts you hold

The information you provide may include Personal Information. “Personal Information” is information that identifies you personally (whether alone or in combination).

If you purchase our Services, you may be required to provide financial information, such as your credit card or bank account number, to a third-party payment processor. We do not collect or store such financial information and we are not responsible for the collection or storage of such information by third parties. We will, however, have access to certain information associated with your account should you purchase the Services, including the amount and date of the purchase.

#### B. Information We Automatically Collect

We may also collect certain information automatically when you visit the Services, including:

- Your browser type and operating system
- Your Internet Protocol (IP) address, which is the number automatically assigned to your computer whenever you access the Internet and that can sometimes be used to derive your general geographic area
- Geolocation information
- Other unique identifiers, including mobile device identification numbers
- Sites you visited before and after visiting the Services
- Pages you view and links you click on within the Services
- Information collected through cookies, web beacons, and other technologies
- Information about your interactions with e-mail messages, such as the links clicked on and whether the messages were opened or forwarded
- Standard Server Log Information

We collect the above information in a variety of ways, including by using “pixel tags”, “web beacons”, and “cookies.”

Cookies are small bits of information that are stored by your computer’s browser. You can decide if and how your computer will accept a cookie by configuring your preferences or options in your browser. However, if you choose to reject cookies, you may not be able to use certain online products, services or features on the Services.

Pixel tags are very small images or small pieces of data embedded in images, also known as “web beacons” or “clear GIFs,” that can recognize cookies, the time and date a page is viewed, a description of the page where the pixel tag is placed, and similar information from your computer or device.

#### Third-Party Information Collection

We may allow third parties to place and read their own cookies, web beacons, and other technologies to collect information through the Services. For example, our third-party service providers may use these technologies to collect information about your visits to this and other websites, mobile websites and/or mobile applications across your various devices. This information is used for traffic measurement, research, analytics and behavioral advertising.

The information collected and stored by third parties remains subject to their policies and practices. We do not control these third parties’ tracking technologies or how they may be used.

We currently use the services of the following third-party vendors, who may collect your information. You can click on the hyperlinks below to view their privacy policies.

- [Google Analytics](#)
- [HelpScout](#)
- [Stripe](#)
- [Facebook](#)
- [LiveRamp](#)
- [AnnounceKit](#)

#### How We Use Your Information

We may use information that we collect about you or that you provide to us, including Personal Information, to measure usage of the Services, to analyze the effectiveness of our Services, to conduct research, to improve and enhance functionality of the Services, to provide support for the Services and respond to requests and inquiries, to provide you with notices, such as updates or changes that we may make to the Services, and to market and advertise the Services, including through promotional e-mail messages, directly or in partnership with other parties, and by displaying our advertisements on other websites that you visit or use. We may also use this information to offer you targeted advertising in order to personalize your experience by showing you advertisements for products and services that are more likely to appeal to you (a practice known as behavioral advertising). Data collected from a particular browser or device may be used with another computer or device that is linked to the browser or device on which such data was collected.

We may from time to time aggregate information in certain data analysis, reports, or other interpretations of trends for both internal and external purposes.

#### Choices About How We Collect, Use and Disclose Your Information

We strive to provide you with choices regarding our collection, use and disclosure of the information you provide to us. The mechanisms listed below aim to provide you with control over such collection, use and disclosure:

- **Marketing Communications.** If you do not want us to send you marketing or promotional communications, you can opt-out by clicking the “unsubscribe” link in any such promotional emails, checking the relevant box located on the form on which we collect your data or emailing us at [help@chartable.com](mailto:help@chartable.com).
- **Cookies.** You have the option to accept or disable cookies at any time through your browser. You may refuse to accept browser cookies by activating the appropriate setting on your browser. If you choose to disable your cookies, your user experience may be limited.
- **Google Analytics.** You can opt out of tracking by Google Analytics by using Google’s Ads Settings or going to <https://tools.google.com/dlpage/gaoptout/>. You may also opt out of Google marketing products, but please note that this does not opt you out of being served generic ads.
- **Third-Party Advertising.** If you are interested in more information about tailored advertising and your choices to prevent third parties from delivering tailored web advertisements, you may visit the following websites: <http://www.networkadvertising.org/choices/> or <http://www.aboutads.info/choices/>. These opt-out tools are provided by third parties. We do not control or operate these tools or the choices that advertisers and others provide through these tools.
- **Cross-Device Data Collection.** You can opt out of cross-device data collection here: [https://liveramp.com/opt\\_out/](https://liveramp.com/opt_out/)

#### Disclosure of Your Information

We want you to understand when and with whom we may share the information we collect. We may disclose information that we collect through the Services with third parties as follows:

- **Service Providers.** We may share your information with our agents and service providers that perform certain functions or services on our behalf, such as to host the Services, manage databases, perform analyses, or conduct surveys.
- **Business Partners.** We will not share your email address with business partners without your explicit permission unless required to do so by law.

- **Other Parties When Required By Law or as Necessary to Protect the Services.** We may disclose your information to third parties in order to protect the legal rights, safety, and security of Chartable and the users of our Services; enforce our Terms of Service; prevent fraud; and comply with or respond to law enforcement or a legal process or a request for cooperation by a government or other entity, whether or not legally required.
- **In Connection With a Transfer of Assets.** If we sell all or part of our business, or make a sale or transfer of assets, or are otherwise involved in a merger or business transfer, or in the event of bankruptcy, we may transfer your information to one or more third parties as part of that transaction.
- **Other Parties With Your Consent.** We may share information about you with other third parties when you consent to such sharing.
- **Aggregate Information.** We may disclose to third parties information that does not describe or identify individual users, such as aggregate website usage data or demographic reports.

You will be notified via email and/or a prominent notice on our Site of any change in ownership or uses of your Personal Information, as well as any choices you may have regarding your Personal Information.

#### Social Networking Services

The Services may allow you to post information to various third-party services or platforms, such as social networking services like Instagram, Twitter and Facebook. You acknowledge that if you choose to use this feature, your friends, followers and subscribers on these third-party services or platforms will be able to view such activity. If you choose to access or make use of third-party social networking services, we may receive information about you that you have made available to those social networking services, including information about your contacts on those social networking services. The use of the information by such social networking websites will be governed by their privacy policies, and we do not control their use of the shared data.

#### Links to Third-Party Sites and Services

The Services may contain links to other websites or online services that are operated and maintained by third parties and that are not under the control of or maintained by Chartable. Such links do not constitute an endorsement by Chartable of those other websites, the content displayed therein, or the persons or entities associated therewith. This Privacy Policy does not apply to this third-party content. We encourage you to review the privacy policies of these third-party websites or services.

#### Do Not Track Signals

Third parties may keep track of your browsing activities across third party websites. California Business & Professions Code Section 22575(b) provides that California residents are entitled to know we respond to “Do Not Track” browser signals. Certain web browsers enable users to activate a “Do Not Track” signal but we do not currently respond to the “Do Not Track” signal or other similar mechanisms.

#### Data Retention

We strive to keep your information only as long as we need it for legitimate business purposes and as permitted by applicable legal requirements. If you close your account, we will retain certain data for analytical purposes and recordkeeping integrity, as well as to prevent fraud, enforce our Terms of Service, take actions we deem necessary to protect the integrity of our Services or our users, or take other actions otherwise permitted by law. If you use our Chartable Dashboard, described in further detail in our Terms of Service, please be advised that we do not delete data that has been included in the pool of data used by our Chartable statistical model. In addition, if certain information has already been provided to third parties as described in this Privacy Policy, retention of that information will be subject to those third parties’ policies.

You acknowledge that Chartable may establish general practices and limits concerning use of the Services, including the maximum storage space that will be allotted on Chartable’s servers on your behalf. You further acknowledge that Chartable reserves the right to change these general practices and limits at any time, in its sole discretion. We will endeavor to give you notice of any such change where required by applicable law.

#### Accessing and Correcting Your Information

If you wish to access, update, correct or delete any Personal Information in our possession that you have previously submitted via the Services, you may log into your account and make updates. If you wish to make changes not available through your account settings, please contact us at [help@chartable.com](mailto:help@chartable.com).

#### Security

We take reasonable steps to protect the Personal Information provided to us from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. However, no Internet or e-mail transmission is ever fully secure or error free. In particular, e-mail sent to or from the Services may not be secure. Therefore, you should take special care in deciding what information you send to us via e-mail. Please keep this in mind when disclosing any Personal Information to us via the Internet. In the event that personal information is compromised as a breach of security, Chartable will promptly notify our customers in compliance with applicable law.

#### Notice to California Residents.

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 calendar 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 send an email to [privacy@chartable.com](mailto:privacy@chartable.com).

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

To request any other changes or information about our collection, use or disclosure of your information, please email us at [privacy@chartable.com](mailto:privacy@chartable.com).

#### Children Under the Age of 16

Our Services are intended for users who are 16 years of age and older. If you are under the age of 16, you are not permitted to submit any Personal Information to us. If you believe we might have any information from or about a child under 16, please contact us at [privacy@chartable.com](mailto:privacy@chartable.com).

#### International Users

Please note that the Services are directed towards users who reside in the United States. By using the Services, you consent to the collection, storage, processing, and transfer of your information in and to the United States, or other countries and territories, pursuant to the laws of the United States. Some of these countries may not offer the same level of privacy protection as your own.

#### GDPR Website Policy

This Privacy Policy (the “**Policy**”) applies to the processing of Personal Data, subject to the General Data Protection Regulation, by Chartable Holding, Inc and its subsidiaries and affiliates (“**Company**”, “**we**”, “**our**”, or “**us**”) through its website, products, and services (the “**Services**”). It describes how we use and disclose such Personal Data, your rights and choices with respect to your Personal Data, and how you can contact us if you have any questions or concerns.

## 1. Personal Data We Collect

In this Policy, “**Personal Data**” means any information relating to an identified or identifiable individual. We may collect Personal Data about you from various sources described below.

### Information Provided by You

- **Account Information.** If you create an account to use our Services, we collect Personal Data related to its creation and the usage of our Services via this account. When you sign up, you may provide us with your name, email address, password, mobile phone number, interests, and other account information.
- **Communications.** When you contact us via a contact form, email, or other means, you provide us with Personal Data, such as your name and contact details, and the content, date, and time of our communications.
- **Support Information.** When you request technical support services, we will process your Personal Data such as your name and the contact details you use to contact us, as well as information on the reasons for your support request, and any additional information you may provide in that context.
- **Careers.** If you apply for a job with us, you may provide us with your resume, name, contact details, and any other relevant information. If you become an employee, we collect additional information, such as your family information, beneficiary selections, banking information, and other relevant information for employment, payroll, and benefit purposes.
- **Podcast download data.** If you download a podcast from one of our publishing partners, we may collect IP address and user-agent information at the time of download. **Advertiser impression or action data.** If you visit a website or download an app with one of our advertising partners, we may collect IP address and user-agent information along with other browser information at the time of that visit or action.

Where applicable, we may indicate whether and why you must provide us with your Personal Data as well as the consequences of failing to do so at the time the data is collected.

### Information Collected from Other Sources

- **Third Parties.** We obtain Personal Data about you from third parties such as Advertising and analytics providers and other entities. This information may include Identifiers and other similar information.

### Information we Collect by Automated Means

- **Social media.** We may collect Personal Data via social media tools, widgets, or plug-ins to connect you to your social media accounts. These features may allow you to sign in through your social media account, share a link, or post directly to your social media account. When you visit a website that contains such tools or plugins, the social media or other service provider may learn of your visit. Your interactions with these tools are governed by the privacy policies of the corresponding social media platforms.
- **Cookies.** We collect Personal Data via cookies and similar technologies (see section 3 of this Policy for more information).

## 2. How We Use Personal Data

We use the Personal Data we collect for the following purposes:

- **Providing Services,** including to operate, maintain, support, and provide our Services.
- **Communicating with You,** including to contact you for administrative purposes (e.g., to provide services and information that you request or to respond to comments and questions) or to send you marketing communications, including updates on promotions and events, relating to products and services offered by us.
- **Personalization,** including to customize our Services to you and provide you with the most relevant marketing and advertising materials.
- **Analytics and Product Development,** including to analyze usage trends and preferences in order to improve our Services, and to develop new products, services, and features.
- **Customer and Vendor Relationship Management,** including to track emails, phone calls, and other actions you have taken as our customer or vendor.
- **Aggregation.** We may aggregate or otherwise de-identify Personal Data and use the resulting information for statistical analysis.
- **Administrative and Legal,** such as to address administrative issues or to defend our legal rights and to comply with our legal obligations and internal policies.

## 3. Legal Basis for the Processing of Personal Data

We rely on a legal basis to process your Personal Data, including:

- **Consent.** You have consented to the use of your Personal Data, for example to send you electronic marketing communications or for the use of certain cookies.
- **Contract.** We need your Personal Data to provide you with our Services and to respond to your inquiries.
- **Legal Obligation.** We have a legal obligation to use your Personal Data, for example to comply with tax and accounting obligations.
- **Legitimate Interest.** We or a third party have a legitimate interest in using your Personal Data, for example for product development and analytics purposes. We only rely on this legal basis when our or a third party’s legitimate interests are not overridden by your rights and interests.

## 4. How We Disclose Personal Data

We may disclose Personal Data about you in the following circumstances:

- **Group Entities.** We may disclose Personal Data about you to our affiliates and subsidiaries.
- **Public Posts.** Any information that you voluntarily choose to post to a publicly accessible area of our Services will be available to anyone who has access to that content.
- **Service Providers.** We work with third-party service providers to provide services such as hosting, maintenance, and support. These third parties may have access to or process your Personal Data as part of providing those services to us.
- **Legal.** We may disclose your Personal Data if we believe, in good faith, that this is appropriate (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside

your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations; (f) to protect our rights, privacy, safety, or property, and/or that of our affiliates, you, or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

• **Merger.** Information about our users, including Personal Data, may be disclosed and otherwise transferred to an acquirer, successor, or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets.

• **Aggregated Information.** We may use and disclose aggregated or otherwise de-identified information for any purpose, unless we are prohibited from doing so under applicable law.

## 5. Your Rights and Choices

Unless otherwise provided under applicable law, you have the following rights:

• **Access and Portability.** You may ask us to provide you with a copy of the Personal Data we maintain about you, including a machine-readable copy of the Personal Data that you have directly provided to us, and request information about its processing.

• **Rectification and Deletion.** You may ask us to update and correct inaccuracies in your Personal Data or to have the information anonymized or deleted, as appropriate.

• **Restriction and Objection.** You may ask us to restrict the processing of your Personal Data or object to such processing.

• **Consent Withdrawal.** You may withdraw any consent you previously provided to us regarding the processing of your Personal Data at any time and free of charge. We will apply your preferences going forward and this will not affect the lawfulness of the processing before you withdrew your consent.

• **Complaint.** You may lodge a complaint with a supervisory authority, including in your country of residence, place of work, or where an incident took place.

You may exercise these rights by contacting us using the contact details at the end of this Policy. Note that there are exceptions and limitations to each of these rights, and that we may nevertheless retain Personal Data about you where we reasonably believe that we have a legitimate reason to do so.

## 6. International Data Transfers

We may transfer your Personal Data outside of Europe and, in particular, to United States of America and other non-European countries, where the level of protection of Personal Data may be different than in your country. If we do so, we will comply with applicable data protection laws, in particular by relying on an EU Commission adequacy decision, on contractual protections for the transfer of your Personal Data, on Binding Corporate Rules, or on the EU-U.S. Privacy Shield framework. For more information about how we transfer Personal Data outside of Europe, or to obtain a copy of the contractual safeguards we use for such transfers, please contact us as specified below.

## 7. Data Security and Data Retention

We use physical, managerial, and technical safeguards that are designed to improve the integrity and security of Personal Data that we collect, maintain, and otherwise process.

We take measures to delete your Personal Data or keep it in a form that does not permit identifying you when this information is no longer necessary for the purposes for which we process it, unless we are required by law to keep it for a longer period. When determining the retention period, we take into account various criteria, such as the type of products or services provided to you, the nature and length of our relationship with you, mandatory retention periods and the statute of limitations.

## 8. Third-Party Services

Our Services may contain features or links to websites and services provided by third parties. Any information you provide via these websites or services is provided directly to these third-party operators and is subject to their privacy policies, even if accessed through our Services. We encourage you to learn about these third parties' policies before providing them with your Personal Data.

## 9. Changes and Updates to this Policy

We may update this Policy from time to time to reflect changes in our privacy practices. If we modify this Policy, we will indicate the date of the latest revision above.

## 10. Our Contact Information

Chartable Holding, Inc is the entity responsible for the processing of your Personal Data. If you have any questions or comments about this Policy, our privacy practices, or if you would like to exercise your rights with respect to your Personal Data, please contact us by email at [privacy@chartable.com](mailto:privacy@chartable.com).

Chartable Holding, Inc  
100 Park Ave, Fl 16  
New York, NY 10017  
USA

In addition, you may contact our Data Protection Officer, Dave Zohrob, at [privacy@chartable.com](mailto:privacy@chartable.com).

CCPA Privacy Policy

Information for California Residents

In addition to our full Privacy Policy at <https://chartable.com/privacy>, this CCPA Privacy Notice applies to certain California residents ("Consumers") from whom we collect personal information as a business under the California Consumer Privacy Act of 2018 (California Civil Code §§ 1798.100 to 1798.199) and its implementing regulations, as amended or superseded from time to time ("CCPA").

For the purposes of this CCPA Privacy Notice, "Personal Information" means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household, or as otherwise defined by the CCPA.

Personal Information does not include information that is:

- Lawfully made available from government records;
- Deidentified or aggregate information; or
- Otherwise excluded from the scope of the CCPA.

Consumer does not include a natural person acting as a job applicant to, employee of, owner of, director of, officer of, medical staff member of, or contractor of Chartable Holding Inc to the extent such person's Personal Information is collected within the context of the person acting in such role. Persons acting in those roles should review the applicable CCPA Limited Privacy Notice made available by Chartable Holding Inc.

## California Consumers' Rights and Choices

If you are a Consumer, the CCPA may permit you to request information regarding the:

- Categories of Personal Information (as defined by applicable California law) collected, sold or disclosed by us;
- Purposes for which categories of Personal Information collected by us are used;
- Categories of sources from which we collect Personal Information;
- Categories of third parties with whom we share Personal Information; and
- Specific pieces of Personal Information we have collected about you and in some cases your Household.

In addition, if you are a California resident you may:

- Opt-out of receiving marketing communications from us; however, you may still receive administrative communications regarding the Services;
- Opt-in to certain financial incentive programs we may offer related to the collection, or deletion of your Personal Information; and
- Request that we and our service providers delete Personal Information we have collected from you, in some circumstances.

Further, the CCPA provides Consumers with the right not to receive discriminatory treatment by a business for the exercise of these CCPA privacy rights, subject to certain limitations.

### Collection and Disclosure of Personal Information from California Residents

The table(s) below outline how we handle Personal Information collected about Consumers in the preceding 12 months from the date this CCPA Privacy Notice was last reviewed.

The personal information contains:	<b>Category of personal information we may collect: Identifiers</b> The Identifiers contain the following information: IP addresses, email addresses, and mobile ad identifiers.
Whether we have sold or otherwise disclosed the Personal information in the previous 12 months:	We have sold and otherwise shared the personal information with third parties in the previous 12 months.
Categories of Third Parties to whom the Personal Information was disclosed:	We may have sold or shared this Personal Information with the following categories of third parties: our service providers, advertising networks, data analytics providers, data brokers, third parties integrated into our services.
	<b>Category of personal information we may collect: Commercial Information</b>
The personal information contains:	The Commercial Information contain the following information: names, addresses, podcast download history.
Whether we have sold or otherwise disclosed the Personal information in the previous 12 months:	We have sold and otherwise shared the personal information with third parties in the previous 12 months.
Categories of Third Parties to whom the Personal Information was disclosed:	We may have sold or shared this Personal Information with the following categories of third parties: our service providers, advertising networks, data analytics providers, third parties integrated into our services.
	<b>Category of personal information we may collect: Internet/Electronic Activity</b>
The personal information contains:	The Internet/Electronic Activity contain the following information: browsing history, podcast listening history.
Whether we have sold or otherwise disclosed the Personal information in the previous 12 months:	We have sold and otherwise shared the personal information with third parties in the previous 12 months.
Categories of Third Parties to whom the Personal Information was disclosed:	We may have sold or shared this Personal Information with the following categories of third parties: our service providers, advertising networks, data analytics providers, third parties integrated into our services.
	<b>Category of personal information we may collect: Geolocation Data</b>
The personal information contains:	The Geolocation Data contain the following information: geolocation based on IP address.
Whether we have sold or otherwise disclosed the Personal information in the previous 12 months:	We have not sold the personal information in the previous 12 months. However, we may have otherwise shared the personal information with third parties in the previous 12 months.
Categories of Third Parties to whom the Personal Information was disclosed:	We may have shared this Personal Information with the following categories of third parties: Our Service Providers, Data analytics providers, Operating systems and platforms, Social networks.
	<b>Category of personal information we may collect: Professional Information</b>
The personal information contains:	The Professional Information contain the following information: Job title, employment history/CV for job applicants.
Whether we have sold or otherwise disclosed the Personal information in the previous 12 months:	We have not sold the personal information in the previous 12 months. However, we may have otherwise shared the personal information with third parties in the previous 12 months.
Categories of Third Parties to whom the Personal Information was disclosed:	We may have shared this Personal Information with the following categories of third parties: Our Service Providers, Data analytics providers, Social networks, Third parties integrated into our services
	<b>Category of personal information we may collect: Inferences</b>
The personal information contains:	The Inferences contain the following information: Characteristics inferred from IP address or other identifiers.
Whether we have sold or otherwise disclosed the Personal information in the previous 12 months:	We have sold and otherwise shared the personal information in the previous 12 months. However, we may have otherwise shared the personal information with third parties in the previous 12 months.
Categories of Third Parties to whom the Personal Information was disclosed:	Our Service Providers, Data analytics providers, Operating systems and platforms, Social networks

### Use of Personal Information

The Personal Information may be used for the purposes disclosed to Consumers at the time of collection, in our general Privacy Policy (see <https://chartable.com/privacy>), and for the purposes of: providing our services, communicating with Consumers, facilitating the connection of third-party services or applications, verifying Consumers' identities, developing and providing marketing materials, personalizing the experience of Consumers on our services (including providing tailored content), facilitating transactions and payments, deidentifying and aggregating the Personal Information, responding to trust and safety issues, complying with judicial process or government requests, auditing related to a current interactions with Consumers and concurrent transactions (including but not limited to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards), detecting security incidents (including protecting against malicious, deceptive, fraudulent, or illegal activity) and prosecuting those responsible, debugging to identify and repair errors that impair existing intended functionality, short-term transient use, performing services on our behalf or on behalf of our service providers (including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services for our or our service providers' short-term transient use) and undertaking internal research for technological development and demonstration. The Personal Information may also be used or disclosed as otherwise permitted or required by applicable law.

### Collection of Personal Information

In the preceding 12 months since this CCPA Privacy Notice was last reviewed, we have collected Personal Information from the following categories of sources: directly from you (e.g. forms you complete or products and services you purchase), indirectly from you (e.g. from observing your actions on our website), directly or

indirectly from someone other than you, advertising networks, data brokers and our business partners.

#### Sale of your Information

We do not sell your information.

Please be aware that we do not accept or process opt-out of sale requests through other means (e.g., via fax, email addresses, or social media).

#### Privacy Requests

If you are a Consumer, you can make requests to know what personal information we have collected you in the past 12 months or to delete your personal information by emailing [privacy@chartable.com](mailto:privacy@chartable.com) or by writing to us at Chartable Holding Inc, 150 Greenwich Street, Floor 62, New York, NY 10007, USA.

Please be aware that we do not accept or process requests through other means (e.g., via fax, social media, phone, etc.).

We will review the information provided and may request additional information to ensure we are interacting with the correct Consumer. If you have a password-protected online account with us, you may be required to log-in to your account for identity verification. If you do not have an account with us, additional information to verify your identity may be required by law before we may take action upon such a request. This additional information may vary depending on the nature of your request and/or the nature of the information about which your request relates. In some cases, we may also be required by law to obtain a signed declaration under penalty of perjury from you that you are the subject of the request being made. If we suspect fraudulent or malicious activity on or from your account, we will delay taking action on your request until we can appropriately verify your identity and the request as authentic.

After submitting your request, you will receive a follow-up outlining the estimated amount of time it will take to complete your request and giving further instructions. That email may also include a link you must click on in order to verify your identity. If you do not click on that link, we will be unable to complete your request due to lack of verification. It is important that you provide a valid email address in order for us to be able to process your request.

By law, we are not required to collect Personal Information that we otherwise would not collect in the ordinary course of our business, retain Personal Information for longer than we would otherwise retain such information in the ordinary course of our business, or reidentify or otherwise link information that is not maintained in a manner that would be considered Personal Information. If we have not requested specific additional information from you to verify your request, please do not send such information.

We generally will aim to avoid requesting additional information from you for the purposes of verification. However, if we cannot reasonably verify your identity or more information is needed for security or fraud-prevention purposes, we may consider any of the following factors, alone or in combination, in requesting additional information:

- The type, sensitivity, and value of the Personal Information collected and maintained about the Consumer, as applicable law requires a more stringent verification process for sensitive or valuable personal information;
- The risk of harm to the Consumer posed by any unauthorized access or deletion;
- The likelihood that fraudulent or malicious actors would seek the Personal Information;
- Whether the Personal Information to be provided by the Consumer to verify their identity is sufficiently robust to protect against fraudulent requests or being spoofed or fabricated;
- The manner in which we interact with the Consumer;
- Available technology for verification; and
- Other factors that may be reasonable in the circumstances, are consistent with industry practice, are recommended by California government officials, or which may be required by law or regulation following the effective date of this CCPA Privacy Notice.

If your request is regarding household information, the same verification steps above may be required before we can provide you with aggregate household information. In addition, if you do not have a password-protected online account with us, for us to process a request for access to or deletion of specific pieces of information regarding your household, we may need all members of the household to make the request, and we may need to individually verify each household member and that each member making the request is currently a member of the house.

We reserve the right to charge a reasonable fee or take other appropriate action in response to requests from a Consumer or household that are manifestly unfounded or excessive, in particular because of their repetitive character.

#### Authorized Agent Requests

You may designate an authorized agent to make a request on your behalf pursuant to applicable law. We accept documentation of your designation in the form of a valid power of attorney and/or a written authorization signed by you and the authorized agent. You may submit evidence of your designation of an authorized agent in writing to: 100 Park Ave, Floor 16, New York, NY 10017, US.

We may require verification of your authorized agent in addition to the information for verification above for Consumers and households.

#### Children

Our Services are not directed to children, and we do not knowingly collect Personal Information from children under the age of 16. If you learn that a child has provided us with Personal Information, then you may contact us as indicated above.

#### Notice of Financial Incentive

We do not offer financial incentives to Consumers based upon the collection or retention of a Consumer's Personal Information.

#### Contact Information

If you have any questions about this Privacy Policy, please contact us at [privacy@chartable.com](mailto:privacy@chartable.com).

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