

Karios Privacy Policy and Notice

This Privacy Notice (“Notice”) governs Karios’ collection and processing of Personal Data in the context of your interactions with Karios, including where you visit Karios’ website (“Site”), receive marketing communications, do business with Karios on behalf of your organization, or are a user of a Karios service procured by your Organization and Karios collects and processes Personal Data related to your use of such service. For the purposes of this Notice, “Personal Data” means any information relating to an identified or identifiable individual. “Karios” in this Notice refers to the relevant Karios company(ies) processing your Personal Data.

What Information Does Karios Collect About You and Why?

Karios may ask you to provide Karios with Personal Data about yourself in order to provide services to you. Karios may collect the following categories of Personal Data about you:

- Personal and business identifiers and contact information such as name, job title, company name, contact, shipping and billing information, phone number, email address, photographs, and contact preferences
- Internet or other electronic network activity, i.e. technical data such as domain name, browser type and operating system, web pages you view; links you click; your device’s IP address; login data e.g. username, account number, password; the length of time you visit Karios’ Site; the URL or the webpage that led you to Karios’ Site
- Performance and usage data about your use of Karios’ Services; information you provide to Karios to receive technical assistance or during customer service interactions; your interests, demographics, experience with Karios’ Services, contact preferences and what you enter into any 'free text' boxes in Karios’ forms;
- Commercial information, i.e. transactional data including credit card and payment data, transaction history

Personal Data may be required to determine access eligibility for certain restricted parts of Karios’ Site or services. Personal Data about you collected online may be combined with information provided off-line or collected from trusted third party sources.

Information Karios Collects Automatically, including via Cookies and Similar Tracking

Technologies. Karios may automatically collect information about your use of Karios’ Site, or services through cookies, web beacons, and other technologies. Karios may combine this information with other information that Karios has collected about you such as your user name. In addition, Karios may collect, modify and analyze metadata and/or operations data, such as system log files, configuration, performance, usage data and transaction counts, from Karios’ software or systems hosting the Service, and from your organization’s systems, applications, and devices that are used with the Service which relate to system utilization and performance statistics.

How Does Karios Use Your Information?

Karios uses the information collected about you as appropriate and relevant for the following **commercial purposes**:

- to register you as a new customer
- to enable you to order products or services, download software updates (“Products”)
- to provide services to you, including programs, online services and customer support
- to allow you to make requests, and register for customized communications programs
- to customize the content and information that Karios may send or display to you
- for marketing and promotional purposes
- to assist Karios in advertising Karios’ products and services on third-party websites
- to follow up with you after conferences and events
- to post testimonials on Karios’ online properties and, subject to your consent, to use your name with your testimonial
- to interact on third-party social networks
- to provide online communities and blogs
- to facilitate the delivery of education and training

Such information may include among others, your name, location and business contact information, information related to the Services you are using, preferences you have selected while visiting the Site, message content and network identifiers related to contacting Karios or using the Site.

Sensitive Personal Data. Karios will only process any special categories of Personal Data (“Sensitive Personal Data”) relating to you for specific purposes outlined above or in relevant supplemental notices, because either: (1) you have given Karios your explicit consent to process that information; (2) the processing is necessary to carry out Karios’ obligations under applicable law; (3) the processing is necessary for the establishment, exercise or defense of legal claims; or (4) you have made the information public.

Biometric data

Karios does not collect, capture, possess, receive or process any biometric data such as retina or iris scans, fingerprints, voiceprints, or scans of hand or face geometry, and Karios expressly prohibits Karios’ customers from providing any such data to Karios without relevant authorization, if applicable.

Legal Basis of Processing

In order to collect, use and otherwise process your Personal Data for the above listed commercial and business purposes, Karios may rely on the following legal bases as appropriate and relevant in the specific context:

- Karios’s legitimate interest in providing the Sites and making the Services available to you, provided Karios’ interest is not outweighed by the risk of harm to your rights and freedoms
- Your consent, where Karios has obtained your consent to process your Personal Data for certain activities. You may withdraw your consent at any time by using the contextual preference tools available in the communications or in the user interfaces of the products and services Karios provides to you. Absent those, please contact Karios as explained below. However, please note that your withdrawal of consent will not affect the lawfulness of any use of your Personal Data by Karios based on your consent prior to withdrawal

- To fulfill any contractual obligations, such as where you have purchased a product or service from Karios. For example, Karios may require your contact details in order to deliver your order if you have purchased a product from Karios
- For compliance with Karios' legal obligations where applicable laws require Karios to process your Personal Data
- For fraud prevention and network and information security purposes when providing Services, pursuant to applicable privacy legislation and to the extent necessary and proportionate for preventing fraud and ensuring network and information security.

To Whom Does Karios Disclose Your Information And Why?

Karios may disclose Personal Data collected about you as follows:

- **Site Visitors.** Your username and any information that you post to Karios' Site, including, without limitation, reviews, comments, pictures and text will be available to, and searchable by, all users of the Site.
- **Affiliates or Subsidiaries.** Data Karios collects about you may be disclosed to Karios' affiliates or subsidiaries.
- **Unaffiliated Third Parties.** Certain data about you may be disclosed to select resellers and/or distributors, particularly if you or your company have purchased through a third party before.
- **Service Providers.** Data Karios collects about you may be disclosed to third party vendors, service providers, contractors or agents who perform functions on Karios' behalf.
- **Business Transfers.** Personal Data Karios has collected about you may be transferred to another company as part of a merger, acquisition or divestiture by or of that company.
- **Consent.** Karios may disclose your personal information to other recipients for any purpose with your consent.
- **Legal Obligations and Rights.** Karios may disclose your Personal Data to any legally entitled recipients: (i) in connection with the establishment, exercise or defense of legal claims; (ii) to comply with laws or to respond to lawful requests or legal process; (iii) for fraud or security monitoring purposes (e.g., to detect and prevent cyberattacks); (iv) to protect the rights of Karios or its employees; or (v) as otherwise permitted by applicable law.

If Karios discloses your Personal Data, to the extent reasonably practicable and permissible, Karios will require its recipients to comply with adequate privacy and confidentiality requirements, and security standards. Personal data collected through and for the purposes of user-requested alerts and service notifications, including but not limited to short code text messages in the U.S. and Canada, will not be disclosed, shared, sold or rented to any affiliated or unaffiliated third parties for marketing purposes.

Cookies. When you visit a Karios Site, cookies, if any, will be used in line with your cookie choices made in the cookie management tool. Karios does not sell your Personal Data, however use of some cookies may constitute "selling" or "sharing" Personal Data under the California Privacy Rights Act. If you do not wish Karios to "sell" or "share" your data in the meaning of the California Privacy Rights Act, you may use the Do Not Sell or Share button available in the website's cookie management tool at any time to turn off cookies. If Karios recognizes the Global Privacy Control (GPC) signal or Do Not Track signal from your browser, Karios will disable non-essential cookies.

How Does Karios Secure Your Personal Data?

Karios has implemented administrative, technical, physical, electronic, and managerial procedures to safeguard and secure the information Karios collects from loss, misuse, unauthorized access, disclosure, alteration, and destruction and to help maintain data accuracy and ensure that your Personal Data is used appropriately. Where Personal Data is processed by service providers on behalf of Karios, Karios has implemented a comprehensive process requiring those service providers to also comply with applicable data protection laws. However, despite these controls, Karios cannot completely ensure or warrant the security of your personal data.

How Long Does Karios Retain Your Personal Data?

Karios will retain your Personal Data for the period necessary to fulfill the purposes outlined in this Notice and/or in applicable supplemental notices, unless a longer retention period is required by law. To determine the appropriate duration of the retention of personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of personal data and if we can attain our objectives by other means, as well as our legal, regulatory, tax, accounting, and other applicable obligations.

Once retention of the personal data is no longer reasonably necessary for the purposes outlined above, we will either delete or deidentify the personal data or, if that is not possible (for example, because personal data has been stored in backup archives), we will securely store the personal data and isolate it from further active processing until deletion or deidentification is possible.

Your Rights

Depending on your country or state of residence you may have some or all of the rights described below with respect to your Personal Data.

- **Email and Marketing.** In most instances, Karios gives you options with regard to the Personal Data you provide, including choices with respect to marketing materials. You may manage your receipt of marketing and non-transactional communications by: (i) clicking on the “unsubscribe” link in marketing emails; or (ii) checking certain boxes on Karios’ preference center which can also be found on certain forms Karios uses to collect Personal Data.
- **Access.** You may request information regarding Personal Data that Karios collects and holds about you and the source(s) of that information. To access your Personal Data, return to the product, service or web page where you originally entered it and follow the instructions in your user interface or on that web page. If you cannot access your information in this way, please contact Karios directly through its website.
- **Rectification.** You have the right to request that Karios rectifies any inaccuracies in relation to the Personal Data Karios holds about you.
- **Erasure.** In some circumstances, you have the right to request the erasure of your Personal Data or object to the further processing of your information.
- **Restriction of Processing.** In some circumstances, you have the right to require Karios to restrict processing of your Personal Data.
- **Objection.** You have the right to object to any direct marketing or to other processing of your Personal Data based on Karios’ or on third parties’ legitimate interests, unless such interests are compelling enough to override your objection.

- ***Not to be discriminated against for exercising any of your other privacy rights.*** You may exercise any of your rights in this section without Karios discriminating against you in any way. Note however that you may be subject to differentiated treatment if and to the extent that the exercise of your rights materially impacts Karios' ability to provide certain services to you (e.g. if you request the deletion of your account information or access credentials, Karios may no longer be able to grant you access to restricted areas of Karios' websites). Such differentiated treatment is objectively justified and does not constitute discrimination.
- ***Withdraw Consent.*** Where Karios relies on your consent, you may have the right to withdraw consent to Karios processing your Personal Data. This will not affect the processing already carried out with your consent.
- ***Not to be subject to decisions based on automated processing.*** In some circumstances, you have the right not to be subject to decisions based solely on automated processing, and to obtain the human review of any such decisions that significantly affect you (please refer to the earlier section on automated decision making).
- ***Complain.*** If you have a complaint, Karios would appreciate the chance to address your concerns; please contact Karios using our website. You may also lodge a complaint with the supervisory data protection authority in the state where you live, work or where an alleged infringement of applicable data protection law occurred.

Change or deletion of information. Please note that if you request a change to or deletion of your Personal Data, Karios may still need to retain certain information for record-keeping purposes, and/or to complete any transactions that you began prior to requesting such change or deletion (e.g., when you make a purchase, you may not be able to change or delete the Personal Data provided until after the completion of such purchase). Some of your information may also remain within Karios' systems and other records where necessary for compliance with applicable law.

Copies. You can request a copy of any Personal Data Karios holds about you, and of which you don't already have a copy. This service is usually free of charge, although Karios has the right to charge a 'reasonable fee' in some circumstances.

How Are Cross-Border Transfers of Data Performed?

Subject to your permission or as permitted by law, the Personal Data that you provide to Karios may be transferred within Karios across state or country borders. This may be done to consolidate data storage or to simplify the management of customer information. Karios has adopted globally recognized privacy principles and safeguards and only collects and/or transmits your Personal Data to the extent it is reasonably necessary to conduct business and perform requested services. Karios and its service providers comply with applicable legal requirements providing for adequate safeguards protection of Personal Data transferred to countries outside of the country of collection or residence.

In certain cases, where Personal Data is transferred to countries that do not offer an adequate level of Personal Data protection according to the country of collection or residence, such transfers are covered by alternate appropriate technical, organizational and contractual safeguards, specifically the Standard Contractual Clauses (issued by the European Commission or the UK's Information Commissioner's Office). If applicable to you, you may obtain copies of such safeguards by contacting Karios. Where local legislation requires your consent to perform international data transfers, the Company will obtain your consent prior to the transfer.

What Choices Do You Have Regarding Karios' Use Of Your Personal Data?

Karios will not use or disclose your Personal Data in ways unrelated to the ones described above without first notifying you and offering a choice, unless Karios reasonably considers that Karios needs to use it for another reason and that reason is compatible with the original purpose. Please note that Karios may process your Personal Data without your knowledge or consent where it is required, or to the extent it is permitted by law.

Karios will provide you the opportunity to opt out of certain Karios communications. If you have any difficulty exercising your choices, please contact Karios.

How Can You Contact Karios?

You may exercise your rights as described in the "Your Rights" section above, or by visiting the contact pages on Karios' website.

Californian Consumers may also submit their requests over the phone by calling the following toll-free number: +1 (888) 914-9661. (833) 452-7467

If you have questions or concerns about this Notice, or the privacy practices relating to Karios' Site or services or wish to contact Karios, please contact Karios using the details below:

Company name: Nexxora, Inc. d/b/a Karios

Email address: info@karios.ai

Postal address: 22365 Broderick Dr, Ste 230, Sterling, VA 20166 USA

What About Children?

Karios does not knowingly collect Personal Data relating to children. If you believe that Karios may have collected Personal Data from someone under the age of thirteen (13), or under the applicable age of consent in your country, without parental consent, please let Karios know using the methods described in the Contact Karios section and Karios will take appropriate measures to investigate and address the issue promptly.

What About California "Shine the Light" Privacy Rights?

California law, under California Civil Code Section 1798.83 (known as the "Shine the Light" law), permits Karios' established customers who are California residents to request information regarding the manner in which Karios discloses certain categories of your Personal Data to third parties, for the third parties' direct marketing purposes. California law provides that you have the right to submit a request to Karios at its designated address and receive the following information:

1. The categories of information Karios disclosed to third parties for the third parties' direct marketing purposes during the preceding calendar year;
2. The names and addresses of third parties that received such information; and
3. If the nature of a third party's business cannot be reasonably determined from the third party's name, examples of the products or services marketed.

You are entitled to receive a copy of this information up to one time per calendar year in a standardized format and the information will not be specific to you individually. Karios' designated email address for

such requests is the one indicated in the contact details above. Karios reserves the right to not respond to requests submitted to addresses other than the addresses specified in this paragraph. In your request, please attest to the fact that you are a California resident. Karios reserves the right to require proof of residence. Please allow up to thirty (30) days for a response.

What About Changes To This Privacy Notice?

Karios may change this Notice from time to time, so please be sure to check back periodically. Karios will post any changes to this Notice on Karios' Site. If Karios makes any changes to this Notice that materially affect Karios' practices with regard to the Personal Data Karios has previously collected from you, Karios will endeavor to provide you with notice in advance of such change by highlighting the change on Karios' Site, or by sending you an email message to the email address you have provided.