# **Privacy Statement**

Last updated: June 5th, 2024

- 1. Your privacy is important to us when using Bullseye. You are trusting us with your data, and we want to make sure it's safe, secure, and handled in a responsible manner. Below is the Privacy Statement that Bullseye ("Company", " us", " our", and " we") commits to which outlines what data we collect and how it is used. We reserve the right to update this Statement and will post any changes here. If you have any questions, please reach out to us here. We comply with applicable data protection legislation, which includes but is not limited to: the GDPR, the UK GDPR, the Swiss Federal Data Protection Act and its implementing regulations ("Swiss DPA"), and the California Consumer Privacy Act 2018 and California Privacy Rights Act 2020 (collectively "CCPA"), in each case, as may be amended, superseded or replaced. Bullseye recognizes the importance of privacy, and this Privacy Statement (or "Statement") is to help you understand and describe how we collect, use, and disclose your data:
  - 2. Collection and use of information
  - 3. Sharing your data
  - 4. Categories of data
  - 5. How we use your data
  - 6. Security of your data
  - 7. Use of third-party services
  - 8. Your Privacy Rights
  - 9. Cookies
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### 2. Collection and use of information.

a. We collect data about you directly from you and automatically through your use of our Services. We may combine data automatically collected with other data that we have collected about you including from publicly available sources. We encourage you to provide only that data that is necessary for using our Services.

- b. Data collected automatically. Like many websites, we rely on technologies to receive and store certain types of data when you interact with us through your device. Using these technologies helps us customize your experience with our Services, and improve your experience.
- 3. Sharing your data. We do not sell your data to any third parties or disclose it in exchange for money or other valuable consideration. We do not share your data with others except as indicated within this Privacy Statement, or when we inform you at a subsequent time. We may share your data as follows:
  - i. With third-party service providers, contractors, or government entities.
  - ii. We use third-party service providers services on our behalf or to assist us with providing services to you such as: to process payment card transactions, sending emails hosting, IT services, or customer service;
  - iii. For search engine optimization ("SEO") purposes and for serving you the most relevant advertising;
  - iv. With service providers and government entities for legal, security, and safety purposes. This includes sharing data to enforce policies or contracts, address security breaches, and assist in the investigation of fraud, security issues, or other concerns.
  - v. If we believe that disclosure is reasonably necessary to comply with a law, regulation, legal, or governmental request; to enforce applicable Terms of Service or this Privacy Statement.
  - vi. For our own internal business purposes including but not limited to product improvement in aggregated, anonymized, and/or de-identified form that cannot reasonably be used to identify you.
- 4. Categories of data. When using Bullseye, we collect information including but not limited to the following potentially personal data (or "personal information"):
  - i. Email: This is used as your account login and we may occasionally send emails communicating to you. We will not share this with any third party that's not necessary for the product to function (e.g. it would be shared with our authentication provider). We will not share your information or email to any third party that is not necessary.
  - ii. Entries and Conversations: when you input data into the Services that is information that is ultimately stored and used in the Services.

- iii. Al Artifacts: there are likely artifacts that are generated from your entries and conversations (e.g. summary, questions, themes); we treat artifacts such as summaries the same as your raw entries and conversations and treat with the same encryption method.
- iv. Phone Number: If you optionally set up text message reminders or other phone functionality, your phone number will be stored. We will not share your phone number to any third party that is not necessary for the product to function.
- v. In addition to this information, we may collect information such as browser metadata and how often you log in, what features you use in the product etc. in order to help us understand high level analytics of how the product is used.
- vi. Other: any other data that you may choose to provide such as giving testimonials concerning the provided services, which we may then post to our sites.
- vii. Clients' records after the Services are rendered.
- viii. Any data that may be required by us to comply with our legal obligations.
- ix. Any other information you choose to submit to the Services.
- 5. How we use your data. We may use data we collect about you to:
  - i. We will use your data to provide our Services to you; we use the payment data you provide to us in order to alert you of, to allow us to present the billing history, and to perform internal financial processes.
  - ii. Improve our products. Analysis about your use of, or interest in our products.
  - iii. We may send you service emails to ensure the service is working properly.
  - iv. Subject to your preference, we may send you emails about new product features or other news about Company or on topics we think would be relevant to you.
  - v. We may contact you to inform you about changes in your services, our service offering and other important service-related notices.
  - vi. To communicate to you information related to the Services, news and value-added improvements, as well as related activities and training.
  - vii. If you apply to a job position in Company, when you send us your application to participate in a job application process.
  - viii. To post Your testimonials or any relevant experience with the aim to show the day-to-day activity of the Company.

- ix. To detect, investigate and prevent activity, we think may be potentially illegal, unlawful or harmful and to enforce our Statement or any other purpose referenced herein or therein.
- x. We may use your data to comply with applicable legal obligations as well as to protect our rights and interests as well as the rights and interests of our users and any other person.

## 6. Security of your data.

- i. We take reasonable and appropriate steps to protect the data entrusted to us and treat it securely in accordance with this Statement. We implement safeguards designed to protect your data from accidental/unlawful destruction, loss, alteration, and unauthorized dissemination. We will retain your data as needed to fulfill the purposes for which it was collected or as needed to fulfill our business needs or legal requirements. In the event that a security issue arises, we will disclose any relevant information via email or our social media channels.
- ii. We have implemented technical and organizational measures designed to protect the data and protect its security, availability, integrity and confidentiality.
- iii. Data collection is limited to the purposes of processing (or the data that You choose to provide).

## 7. Use of third-party services.

- i. The use of third-party services and software libraries is necessary to help power features of the Company including providers where raw entries and conversations may be sent in order to power functionality or otherwise help deliver our Services. We may share personal data with third-party service providers to support our provision of the Services and the operation of our business.
- ii. By using Company, you are effectively agreeing to the privacy practices of our providers.
- 8. Privacy Rights. THIS INCLUDES CALIFORNIA (AND OTHER STATES [INCLUDING BUT NOT LIMITED TO VIRGINIA AND COLORADO)] AND OTHER APPLICABLE LAWS FOR PRIVACY RIGHTS SUCH AS GDPR. The following disclosures are intended to provide additional information about (1) the categories of Personal Information we collect (as defined above), (2) the source of the Personal Information, (3) how we use each category of

Personal Information, and (4) how we disclose Personal Information. These disclosures do not limit our ability to use or disclose information as described above.

- i. Category of Personal Information: Name, e-mail or user ID, profile password, gender, phone number, payment details, date of birth, geolocation, and any other conversation content that might be generated by you on the Services or your use of the Services.
- ii. Sources of Personal Information: directly from you, third-party sites or sources such as our trusted business partners, analytics tools, and social networks.
- iii. Use of Personal Information: deliver the Services to you, provide you information and communicate with you about your account and usage such as about your payments or transaction history, provide you promotions, enhance and personalize your user experience. Lastly, to improve our Services as well as build new services in the future.
- iv. Disclosure of Personal Information: our affiliates, our services providers such as for hosting the Service, processing payments, and communicating with you.
- 3. To the extent provided for by law, you may have the following privacy rights:
- i. The right to know what Personal Information we have collected and how we have used and disclosed it;
- ii. The right to request deletion of your Personal Information; and
- iii. The right to be free from discrimination relating to the exercise of your privacy rights.
- 4. We do not and will not sell or share (as defined by CPRA) your Personal Information.
- 5. Exercising Your Rights: Data subjects can exercise the above privacy rights by filling out <a href="mailto:this.form">this form</a>.
- 6. Verification: in order to protect your Personal Information from unauthorized access or deletion, we may require you to verify your identity before you can submit a privacy request to know or delete Personal Information. In order to keep your data accurate and complete, you can log in to review and update your Account data. You may also contact us to: request the personal data we have collected from you or request the rectification or deletion of such data. We will do our best to honor your requests subject to any legal

and contractual obligations. If you do not wish to receive promotional emails from us, you may opt out at any time by using the link in the email itself. Please note that it may take up to ten (10) days to process your request.

7. Authorized Agent. You may submit a request to know or a request to delete your Personal Information through an authorized agent. If you do so, the agent must present signed written permission to act on your behalf and you may also be required to independently verify your identity and submit proof of your residency.

#### 9. Cookies.

- i. Our Services use cookies and other similar device identification technologies (collectively "cookies") to provide our services, to understand how they are used, and for analytics, personalization, customization and marketing purposes. Personal data, such as your email address, may be collected through the cookies.
- ii. Cookies may also be set by the Services to enable them to function properly. Information collected by these cookies is governed by the privacy notices of the company or companies that created it.
- iii. What are cookies? We use the term "cookie" to refer to all technologies which store and access information on the device that you use to access our services, such as your computer, tablet, or mobile phone. For example, we use HTTP cookies (web/browser cookies), which are small data files (typically made up of numbers and letters) that are downloaded when you access our services and allow us to recognize your device.
- iv. Cookies enable websites to recognize your device and are often used to help the website function properly and to provide information to the owner(s) of the site. Cookies are necessary to recognize or "remember" anything about visitors.
- v. First party cookies: these are sent and are managed by Company.
- vi. Third-party cookies: these are not owned managed by Company, but by another entity.

#### vii. Further information:

1. When you visit our sites or otherwise interact with our Services, we and our service providers acting on our behalf automatically collect certain data using

tracking technologies like cookies, and similar technologies. We use this data to understand how visitors to our websites are using them and which pages and features of the websites are most popular. This helps us understand how we can improve our websites and track performance of our advertisements.

- 2. In addition, we use tracking technologies to help improve the navigation experience on our Services. We don't sell this information to third parties.
- Cookies and similar technologies are pieces of data contained in a very small text file that is stored in your browser and/or device. These allow our Services to identify your device as you navigate our Services.
- 4. By themselves, cookies do not identify you specifically, instead they recognize your web browser or device.
- 10. Children's data. You must be at least eighteen (18) years of age to use the Services, unless the age of majority in your jurisdiction is greater than eighteen (18) years of age, in which case you must be at least the age of majority in your jurisdiction (e.g., twenty-one (21)), or you must have verifiable parental consent. If you are under the applicable age of majority and do not have verifiable parental consent, you shall not use and are not permitted to use the Services and you must immediately leave the Services. By Using the Services, you represent and warrant that you have reached at least the age of eighteen (18) and the age of majority in your jurisdiction. We maintain a zero-tolerance policy for any minors on the Services. For the avoidance of doubt, this includes whether such individuals are actually minors or pretending to be minors (e.g., role-play). We do not knowingly collect Personal Information from anyone under the age of 18. If we discover that a person below 18 years of age or younger has provided Personal Information to us, we automatically delete such information. If you are a parent or guardian of a minor under the age of eighteen (18) and believe he or she has disclosed Personal Information to us, please contact us here.
- 11. Users outside the United States. If you are an individual located in another jurisdiction outside of the United States ("US") such as the European Economic Area, United Kingdom, or Switzerland (collectively "EEA") with laws governing data processing that differ from US laws, please be aware that data we collect will be processed and stored in the US or in other countries where we or our service providers have operations. Your use of the Services is

voluntary and you are doing so with a full understanding that by submitting your data to Company, you understand and acknowledge to have your data transferred to, US or another jurisdiction which may not offer the same level of privacy protection as those in the country where you are located.

- 12. Changes and contacting us. This Statement is current as of the Effective Date set forth above and if any changes are made, we'll post them on this page. If you continue to use Company after those changes are in effect, you agree to the changes. This Statement may change if there is a material change to the way data is processed by Company.
- 13. If you have any questions or comments about this Statement, please contact us here.