

ContractPodAi Privacy Policy

- Version 24 November 2021

At ContractPodAi, we’re committed to protecting your privacy. This Privacy Policy applies to the information and data collected by ContractPodAi when you interact with us on our websites (or through other channels, such as communicating with us or giving us your information at an event) and when you use our products and services. This Privacy Policy describes how we collect, receive, use, store, transfer, and process your Personal Data. It also describes your choices and rights with respect to your Personal Data, including your rights to access and correct your Personal Data. Unfortunately, if you cannot agree with the terms of this Privacy Policy, you may not use our websites nor use the Subscription Service.

Customers of ContractPodAi may collect and manage Personal Data when using the Subscription Services. ContractPodAi processes such data as a Processor under direction of our Customers. When this is the case, the Customer is the Data Controller and they are responsible for complying with any regulations or law that require providing notice, disclosure, and/or obtaining consent prior to collecting their users’ Personal Data using the Subscription Services. We detail this more below; you can also see our [ContractPodAi Data Processing Addendum](#) for more information.

We update this Privacy Policy from time-to-time and we encourage you to review this Privacy Policy periodically. If there are changes to this Privacy Policy, we will post them on this page (<https://contractpodai.com/legal/privacy-policy/>); if the changes are substantial (in legal terms, material), then we will provide a notification by email, within the Subscription Services, and on this website.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this Privacy Policy, as well as any capitalized terms that are not otherwise defined in this Privacy Policy.

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1. General Information & About Us.

Generally.

ContractPodAi is made up of different legal entities, details of which can be found here: <https://contractpodai.com/about/>. This privacy policy is issued on behalf of the ContractPodAi group of companies so when we mention "ContractPodAi", "we", "us", or "our" in this privacy policy, we are referring to the relevant company in the ContractPodAi group responsible for processing your Personal Data. We will let you know which entity will be the controller for your personal data when you purchase a product or service with us (it will most likely be specified in your Order Form).

For our website, ContractPod Technologies Limited, a company with limited liability registered in Scotland with Company Number SC425646, is the controller responsible for processing your Personal Data and responsible for this website.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

Contact details.

If you have any questions about this privacy policy or our privacy practices, please contact our data privacy manager in the following ways:

- **Full name of legal entity:** ContractPod Technologies Ltd.
- **Email address:** privacy@contractpodai.com
- **Postal address:** 27b Greenhill Gardens, Greenhill, Edinburgh, Scotland EH10 4BL (UK)

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK

regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

Third-party links.

This website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. What We Collect.

Information You Provide to Us.

ContractPodAi requires each Customer to provide Personal Data to access and use ContractPodAi's products and services. Personal Data may be captured when:

- *You access or use our websites/services:* a visitor accesses our public website or our Subscription Services (for simplicity we'll now refer to our public website and the Subscription Services as the "Sites") or,
- *Disclosure through contacting us:* a person contacts an ContractPodAi employee and willingly discloses that information. This disclosure may occur when a visitor registers with the Sites, engages in transactions, contacts customer service, or participates in contests, promotions, surveys, forums, content submissions, requests for suggestions, or other aspects of services offered by ContractPodAi.
- *Calls/Electronic Communications.* In the regular course of our business, ContractPodAi may monitor and record phone conversations or email communications between you and ContractPodAi employees for training and quality assurance purposes. We may receive a confirmation when you open or click on content in an email from us, which helps us make our communications to you more useful and interesting.
- *Surveys, Sweepstakes, and Contests.* We may provide you the opportunity to participate in surveys on our Sites, to measure customer satisfaction. If you participate, we may request certain Personal Data from you. Participation in these surveys, sweepstakes, or contests is completely voluntary and you therefore have a choice whether to disclose this information. The requested information typically includes name, email address, and mailing address.
- *Testimonials and Reviews.* We may display personal testimonials of satisfied customers. We will ask for your specific consent as part of the survey. If you wish to update or delete your testimonial, you can contact us at privacy@contractpodai.com. We may also display customer reviews; if you provide a review that we display and wish to update or delete it, you can also contact us at privacy@contractpodai.com.

The Types of Personal Data We Collect from You

The types of Personal Data we might collect includes:

- (i) **"Contact Data"** or **"Identity Data"** (such as real names, postal addresses, unique personal identifiers, phone numbers, and email addresses);
- (ii) **"Financial Data"** (such as your ACH information, billing information, wire transfer instructions, credit card information, or bank account information);
- (iii) **"Demographic Data"** (such as general geographic information, imprecise location, approximate age, and employer information);
- (iv) **"Visitor Data"** (such as IP addresses, browser settings, internet service provider (ISP)

information, referring/exit pages, operating systems, date/time stamps, and clickstream data)

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

Please note that our Customers, in their use of the ContractPodAi Services, may create user profiles for their Authorized Users. These profiles are controlled entirely by the Customer and each Customer individually determines what information is input into these user profiles as well as how they are maintained. See [Information Collected by Our Customers](#).

Information We Collect Automatically.

- *Traffic Data.* ContractPodAi or our third-party service providers may collect a variety of Visitor Data. The ContractPodAi internal servers and software automatically recognize Visitor Data. The Sites may use Visitor Data to compile traffic data about the types of visitors who use the Sites at specific intervals (collectively “Traffic Data”).
 - We may use Traffic Data to analyze Site traffic. We may also use Traffic Data to diagnose problems with our server, administer our Site, or display content according to your preferences. Visitor Data and Traffic Data may also be shared with business partners, affiliates, or advertisers on an aggregated and anonymous basis.
- *Cookies.* ContractPodAi may use the standard cookie feature of major browser applications and third-party providers, including Google Analytics features (Remarketing, Google Display Network Impression Reporting, the DoubleClick Campaign Manager Integration and Google Analytics Demographics and Interest Reporting), or employ internally developed cookies, clear GIFs, pixel tags, tracking codes, and other technologies that allow ContractPodAi to store a small piece of data on a visitor’s computer, or any other device a visitor uses to access the Sites, about your visit to the ContractPodAi website or the Subscription Services. You can remove persistent cookies by following directions provided in your internet browser. If you reject cookies, you may still use our site, but your ability to use some areas of our Sites may be limited.
- *Location Information.* When you use the Sites, we may collect general location information (such as general location inferred from an IP address).

Information from Other Sources.

We may collect information about you from third parties, such as marketing partners and researchers. Our customers may give us information about you, such as your Contact Data, to facilitate contracting through the Sites. We may combine this information with information we collect from you and use it as described in this Privacy Policy.

Information Collected by our Customers.

Our online Subscription Service allows our customers to create, store, and share content, typically legal content. We do not control the content of, or the types of Personal Data that our customers may choose to collect or manage using the Subscription Service. We store our customers' information on our service providers' servers but process it as a processor under our customers' instructions and in accordance with our ContractPodAi Terms of Service, which prohibit us from using the information except as necessary to provide and improve the Subscription Service and as required by law.

Our customers control and are responsible for correcting, deleting, or updating the information they process using the Subscription Service and for complying with any regulations or laws that require providing notice, disclosure, and/or obtaining consent prior to transferring the Personal Data to ContractPodAi for processing purposes.

Because of the nature of the Subscription Services, this information may contain any type of Personal Data, including Contact Data, Financial Data, Demographic Data, and Legal Data (such as social security numbers, company information, trade secrets, inventions, and idea submissions and other sensitive information necessary to generate legal documents). We process such data only in accordance with our customers' instructions. For such data, the customer is the Controller (for purposes of GDPR) or the "business" (for purposes of the CCPA) and is responsible for most aspects of the processing of the personal information. If you have any questions or concerns about how your personal information is processed in these cases, including how to exercise your rights as a data subject, please contact the Customer. If we receive any rights requests concerning instances where we act as data processor, we will forward your query on to the relevant Customer.

We may also collect the information of third-party individuals on behalf of our customers. For example, our Customers may use information input into the Subscription Services or from third-party services to collect counterparty information to populate a contract. ContractPodAi uses this information for the purpose of administering and improving the Subscription Services for our Customers but does not use this information for any other purposes.

3. How do we use the information we collect?

We will only use your personal data when the law allows us to. Most commonly, we will use your Personal Data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Check the Glossary to find out more about the types of legal basis that we will rely on to process your Personal Data.

Generally, we do not rely on consent as a legal basis for processing your Personal Data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data.

We have set out below, in a table format, a description of all the ways we plan to use your Personal Data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your Personal Data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your Personal Data where more than one ground has been set out in the table below.

Purpose	Type of data	Legal basis for processing
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees, and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)

To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Visitor	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Visitor	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Demographic (d) Visitor	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Demographic (b) Visitor	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Demographic (d) Visitor	Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing.

We strive to provide you with choices regarding certain Personal Data uses, particularly around marketing and advertising. Depending on your location, you may have additional options for refusing Cookies, electing to opt-in or opt-out of communications, and similar choices.

We may use your Identity, Contact, Technical, Usage, and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You will receive marketing communications (such as promotional emails and newsletters) from us if you:

- have registered on our website for this particular purpose,
- have otherwise opted in to receive such emails (for example during an event we are organizing)
- have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

We will get your express consent before we share your Personal Data with any third party for marketing purposes.

Opting out.

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by [contacting us](#) to request removal.

Where you opt out of receiving these marketing messages, this will not apply to Personal Data provided to us as a result of a product/service purchase, product/service experience, or other transactions.

Cookies.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Change of purpose.

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

4. Analytics & Advertising

- **Analytics.** We may use third-party web analytics services on the Sites, such as those of Google Analytics. These service providers use the sort of technology described in the “Information We Collect Automatically” section above to help us analyze how users use the Sites, including by noting the third-party website from which you arrive. The information collected by the technology will be disclosed to or collected directly by these service providers, who use the information to evaluate your use of the Service. We also use Google Analytics for certain purposes related to advertising, as described in the following section. To prevent Google Analytics from using your information for analytics, you may install the [Google Analytics Opt-Out Browser Add-on](#).
- **Advertising.** Our partners and affiliates, including Google Analytics (Remarketing, Google Display Network Impression Reporting, the DoubleClick Campaign Manager Integration, and Google Analytics and Interest Reporting), may use cookies and web beacons to collect information about your activities on this and other websites to provide you targeted advertising based upon your interests. This means that these partners and affiliates may show our ads on sites across the Internet based upon your previous visits to our site. Together with our partners and affiliates, we may use these cookies and web beacons to report how your ad impressions, other uses of ad services, and interactions with these ad impressions and ad services are related to your visits to our site.

The use of tracking technologies by our service providers, technology partners or other third-party assets (such as social media links) on the site is not covered by our Privacy Policy. We do not have access or control over these technologies.

If you would like to learn more or opt out of receiving online display advertising tailored to your interests, please visit the Networking Advertising Initiative at www.networkadvertising.org/managing/opt_out.asp or the Digital Advertising Alliance at <http://aboutads.info/choices>. Please note this does not opt you out of being served advertising. You will continue to receive generic ads. If you delete your cookies, use a different browser, or buy a new computer, you will need to renew your online display advertising opt-out choice. To opt out of Google Analytics for Display Advertising or customize Google Display Network ads, you can visit the [Google Ads Settings page](#).

- **Do Not Track.** We do not recognize or respond to browser initiated Do Not Track signals, as the industry is currently still working on Do Not Track standards, implementations, and solutions.

5. Your Options.

You may choose not to provide ContractPodAi with Personal Data or you may turn off cookies in your browser by changing its settings. If you make these decisions, you may continue to use the public website and browse its pages. However, ContractPodAi cannot process orders, provide services or communications to you without your Personal Data.

- **User and Authorized Contact Access to Order Information.** ContractPodAi will give you, or anyone listed as an authorized contact for your account, information about your order. This may include information about the nature and status of your order, information you provided to process your order, payment information, and contact information. If you want someone to have access to your order, you must list them as an authorized contact, or they may not obtain information.
- **Deleting Your Information.** If you want to remove your Personal Data from our public website (such as if you have received a promotional email), you may contact privacy@contractpodai.com.
- **Opting Out of Marketing.** You can opt-out of promotional communications by following the unsubscribe instructions in any communication or by emailing us at privacy@contractpodai.com. Generally, you may not opt-out of service-related or transactional communications, which are not promotional. If you do not wish to receive service-related communications, however, you may terminate your account by contacting your Subscription Services administrator.

Data Retention.

We will only retain your Personal Data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your Personal Data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting, or other requirements.

By law we must keep basic information about our customers (including Contact, Identity, Financial, and Transaction Data) for six years after they cease being customers for tax and legal purposes. This period may be longer or shorter depending on the jurisdiction in which such customer and the ContractPodAi group company is located.

In some circumstances you can ask us to delete your Personal Data; see below for further information.

In some circumstances we will anonymize your Personal Data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Data Security.

We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used, or accessed in an unauthorized way, altered, or disclosed. In addition, we limit access to your Personal Data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Unfortunately, no data transmission is guaranteed to be 100% secure and we therefore cannot guarantee the security of information you transmit to or from the public website or the Subscription Services, and you provide this information at your own risk. ACCORDINGLY, WE DISCLAIM LIABILITY FOR THE THEFT, LOSS, OR INTERCEPTION OF, OR UNAUTHORIZED ACCESS OR DAMAGE TO, YOUR DATA OR COMMUNICATIONS BY USING THE SITE, APPLICATIONS, AND OUR SERVICES. YOU ACKNOWLEDGE THAT YOU UNDERSTAND AND ASSUME THESE RISKS.

IF YOU BELIEVE YOUR PRIVACY HAS BEEN BREACHED THROUGH USE OF OUR WEBSITE, APPLICATIONS, OR OTHER SERVICES PLEASE CONTACT US IMMEDIATELY AT privacy@contractpodai.com.

6. EEA, Switzerland, and UK Individuals

Legal Basis for Use of Your Information.

Please see Section 4, above, for a table of the legal basis for use of your Personal Data.

Data Subject Rights.

Residents of the European Economic Area (“EEA”), Switzerland, and the UK can exercise certain data subject rights available to them under applicable data protection laws. Where such rights apply, we will comply with requests to exercise these rights in accordance with applicable law. Please note, however, that certain information may be exempt from such requests in some circumstances, which may include if we need to keep processing your information for our legitimate interests or to comply with a legal obligation.

Depending on the laws/regulations where you reside, you may have the right to exercise certain rights with respect to your data. We have tried to mark the rights with the most common data protection law regimes, but this is informational only:

- **Request access** to your Personal Data (commonly known as a "data subject access request"). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your Personal Data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your Personal Data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your Personal Data. This enables you to ask us to suspend the processing of your Personal Data in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful, but you do not want us to erase it.
 - Where you need us to hold the data even if we no longer require it as you need it to establish,

exercise or defend legal claims.

- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent. For more information on how to exercise these rights, please contact us.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

Customer Controlled Personal Data.

In instances where we process personal information on behalf of our customer, rights requests should be directed to the relevant Customer. Any request sent directly to us that pertains to information collected on behalf of a customer will be forwarded on to that customer.

International Data Transfers.

Information submitted to ContractPodAi will be transferred to, processed, and stored in the United States, or for certain customers, the European Union or Japan. If you post or transfer any information to or through the Sites, you are agreeing to such information, including Personal Data, being hosted and accessed in the United States, the European Union, and Japan. Please note that the privacy laws of the United States, the European Union, and Japan may be different from those in the place where you are a resident.

Where required, we will use appropriate safeguards for transferring data outside of the EEA, Switzerland, and the UK. This includes signing Standard Contractual Clauses that govern the transfers of such data, which may be used in conjunction with additional safeguards. For more information about these transfer mechanisms, please contact us.

7. Supplemental Privacy Notice for California Residents

This Supplemental Privacy Notice supplements the information in our Privacy Policy above. It applies to personal information we collect on or through the Sites and through other means (such as information collected offline, in person, and over the telephone). It does not apply to personal information we collect from our employees and job applicants in their capacity as employees and job applicants. It also does not apply to personal information we collect from employees, owners, directors, officers, or contractors of businesses during the provision or receipt of business-related services.

Summary of Information We Collect

If you are a California resident, California law requires us to provide you with some additional information regarding how we collect, use, and share your “personal information” (as defined in the California Consumer Privacy Act (“CCPA”).

California law requires that we detail the categories of Personal Data that we disclose for certain “business purposes,” such as to service providers that assist us with securing our services or marketing our products, and to such other entities as described in the sections titled [The Types of Personal Data We Collect from You](#) and [Purposes for Which We Will Use Your Personal Data](#). We may disclose the following categories of

Personal Data for our business purposes: Identifiers; Commercial information; Internet activity information; Financial information; Professional and employment-related information; Education information; and Inferences drawn from any of the above information categories.

We may also use the above categories of personal information for compliance with applicable laws and regulations, and we may combine the information we collect (“aggregate”) or remove pieces of information (“de-identify”) to limit or prevent identification of any particular user or device.

Consumer Rights

California law grants state residents certain rights, including the rights to access specific types of Personal Data, to learn how we process Personal Data, to request deletion of Personal Data, and not to be denied goods or services for exercising these rights. In instances where we process personal information on behalf of our customer, rights requests should be directed to the relevant customer. Any request sent directly to us that pertains to information collected on behalf of a customer will be forwarded on to that customer.

If you would like to exercise any of these rights, you can submit a request to privacy@contractpodai.com. You will be required to verify your identity before we fulfill your request. To do so, you will need to provide information to match with our existing records to verify your identity, depending on the nature of the request and the sensitivity of the information sought. You can also designate an authorized agent to make a request on your behalf. To do so, you must provide us with written authorization or a power of attorney, signed by you, for the agent to act on your behalf. You will still need to verify your identity directly with us.

“Sale” of Personal Information

The CCPA requires businesses to disclose whether they sell Personal Data. *As a business covered by the CCPA, we do not sell Personal Data.* We may share Personal Data with third parties or allow them to collect Personal Data from our sites or services if those third parties are authorized service providers or business partners who have agreed to our contractual limitations as to their retention, use, and disclosure of such Personal Data, or if you use ContractPodAi sites or services to interact with third parties or direct us to disclose your Personal Data to third parties.

California Shine the Light

We do not share personal information with third parties for their direct marketing purposes.

8. Children’s Privacy

The Sites are not directed to children under the age of 13. We do not knowingly collect personal information (as that term is defined in the Children’s Online Privacy Protection Act (COPPA)) from children under 13. If we discover that an individual under 13 has provided us with personal information, we will delete the personal information to the extent required by COPPA.

We do not knowingly process data of EU residents under the age of 16 without parental consent. If we become aware that we have collected data from an EU resident under the age of 16 without parental consent, we will take reasonable steps to delete it as soon as possible.

9. Additional Information

Definitions

- **“Order”** or **“Order Form”** means the ContractPodAi-approved form or online subscription process by which you agree to subscribe to the Subscription Services.
- **“Personal Data”** means any information relating to an identified or identifiable individual including where such information is contained within Customer Data and is protected similarly as personal data or personally identifiable information under applicable Data Protection Laws (as defined in the

ContractPodAi Data Processing Addendum). Personal Data does not include data where all identifying information has been removed—this is called *anonymous data*.

- **"Subscription Service(s)"** means our web-based applications, tools, and platforms that you have subscribed to under an Order Form or that we otherwise make available to you, and are developed, operated, and maintained by us, accessible via a designated URL, and any ancillary products and services that we provide to you, including set-up and implementation services.
- **"Third-Party Products"** means non-embedded products and professional services that are provided by third parties which interoperate with or are used in connection with the Subscription Service.
- **"You", "your," or "Customer"** means the person or entity using the Subscription Services and identified in the applicable account record, billing statement, online subscription process, or Order Form as the customer.

Lawful Basis

- **"Legitimate Interest"** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#).
- **"Performance of Contract"** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- **"Comply with a Legal Obligation"** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.