

## Corrily, Inc. – Privacy Policy

Corrily, Inc. (“we”, “our”, “us”) is a company established in the United States with a registered office at 2261 Market Street 4154 San Francisco, CA 94114 and for the purpose of applicable data protection laws, we are the data controller. Our representative in the European Economic Area and the UK is:

### **GDPR Local Ltd.**

Address: GDPR Local Ltd.

Adam Brogden, EU and UK Representative

Phone number: +441 772 217 800 (UK), + 353 15 549 700 (EU)

Email: [contact@gdprlocal.com](mailto:contact@gdprlocal.com)

Activities relevant to the data transferred under these Clauses: Processing in order to represent the Processor in the UK in case of GDPR requests

This Privacy Policy sets out how we collect, use, disclose and otherwise process personal data and usage information we collect from you, or that you provide to us, in connection with your use of our website at <https://corrily.com> (our “Website”) and in connection with the services, platform and tools we provide to let our customers find and adjust the optimal local prices for their business (together, the “Services”). There are circumstances where we handle data about our customers’ end users and process this data on behalf of our customers (in a role sometimes referred to as a “processor” or “service provider”) in providing the Services, and this Privacy Policy does not apply to our handling of data in those circumstances.

Please read this Privacy Policy carefully. This Privacy Policy supplements any other privacy related notices and policies we may provide to you from time to time, and is not intended to override them. If you do not agree with this Privacy Policy in general or any part of it, you should not access the Website, use our Services or otherwise provide your information to us.

We change our Privacy Policy from time to time. If we make changes, we will update the last revised date, post the updated version on our Website and take any other steps necessary to comply with applicable law. Please check the Website regularly for notices of changes to our Privacy Policy.

## **1. THE INFORMATION WE COLLECT**

### Information you give to us

You may provide some or all of the following personal data to us by using our Services or contacting us via our Website, our Services or by, email, social media, instant chat, our “contact us” page, or otherwise or by signing up for our newsletters or alerts:

- Contact information, such as name, email address, telephone number and social media handle.
- Account information, such as username and password.
- Billing or payment information necessary to provide the Services to you.
- Any other information that you voluntarily provide to us.

This information is required to enable us to fulfil our contract with you. If you do not provide this information, we will not be able to provide you with our Services.

### Information we collect automatically

When you visit our Website and use our Services we automatically collect usage information sent to us by your computer, mobile phone or other device. This information includes: (i) your IP address; (ii) device information including, but not limited to, name and type of operating system; (iii) mobile network information; (iv) standard web information such as your browser type and the pages you access on our Website; (v) transaction information (but not payment card or account details), including device information, transaction details, and IP address; (vi) security information including a list of certain installed software, device and internet connection information, and available space on the device.

We may associate this usage information with your account (if you have a registered account), the device you use to access the Website or Services, or email or social media accounts that you use to engage with us.

### Information we collect from third parties

We also obtain personal data about you from other sources:

- Third parties that you choose to share with us, for example if you interact with us on social media, we will collect information about those interactions.
- Third party service providers who help us process or supplement the information you have provided (e.g., from our payment processor).
- When you visit our Website, third parties may automatically collect the usage information sent to us by your computer, mobile phone or other device.
- Other sources, such as from our customers and publicly available sources.

Any personal data and usage information that we receive from outside sources will be treated in accordance with this Privacy Policy. We are not responsible or liable for the accuracy of the information provided to us by third parties and are not responsible for their policies or practices.

## **2. HOW DO WE USE YOUR INFORMATION?**

We process your personal data in order to perform our contract with you, such as:

- provide you with our Services, other content and Website functionality;
- register and maintain your account with us.

We obtain your consent to process your personal data for the following reasons:

- sign you up for our newsletters or alerts;
- personalize our services for you; and  
if you opted into marketing, to communicate with you about products, services, marketing, promotions, events and other news and information we think will be of interest to you.
- In order to be responsive to you, to provide effective services to you, and to maintain our business relationship, as a matter of our legitimate interests, we will use your personal data to:
- administer the Website and Services, and for internal operations, in order to conduct troubleshooting, data analysis, testing, research, statistical and survey analysis;
- maintain the safety and security of our users, the Website, our Services, and business;
- send you announcements in relation to security, privacy or administrative related communications (these communications are not marketing orientated, and we do not rely on consent, so you may not opt out);

- personalize our Website and our Services to ensure content is presented in the most effective manner for you and your device; and
- generally improve and develop our products and services.

We may create aggregated, de-identified or other anonymous data from personal data we collect via our Services. We may use and share this data with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business.

In addition, we will use some or all of the above information to comply with any applicable legal obligations, to enforce any applicable terms and conditions and/ or terms of service, and to protect or defend the Website or Services, our rights, the rights of our users, or others.

### 3. COOKIES AND OTHER TRACKING TECHNOLOGIES

We use cookies and other similar technologies, including Google Analytics, to collect information about your browsing activities over time and across different websites following your use of our Services. Cookies allow us to recognize and count the number of users and to see how users move around our website when they are using it. This helps us to improve our Services and the way our website works. You can find more information about cookies and how to manage them [here](#). For further information about Google Analytics, please click [here, and to](#) opt out of tracking by Google Analytics, click [here](#).

Your browser settings may allow you to transmit a “Do Not Track” signal when you visit various websites. Like many websites, our website is not designed to respond to “Do Not Track” signals received from browsers. To learn more about “Do Not Track” signals, you can visit <http://www.allaboutdnt.com/>.

### 4. HOW THE COMPANY SHARES YOUR INFORMATION

We do not use or share personal data or usage information with others except as described in this Privacy Policy. In certain circumstances, we will share your information with third parties with your consent, as necessary, or as otherwise required or permitted by law. Specifically, we share personal data and usage information:

- ***With service providers and vendors for business purposes in our legitimate interests, or to perform a contract with you.*** Such third parties include: (i) data analytics vendors; (ii) security vendors; (iii) website hosting vendors; and (iv) cloud storage vendors. These service providers assist us with many different functions and tasks, such as providing data storage and disaster recovery services and communicating with you.
- ***When you request us to share certain information with third parties, with consent or to perform a contract with you.*** With your permission or upon your discretion, we will disclose personal data and usage information to relevant third parties.
- ***With professional advisors, in our legitimate interests or as required by law.*** As necessary, we will share personal data and usage information with professional advisors functioning as service providers such as auditors, law firms, or accounting firms.
- ***For legal and security reasons and to protect our services and business, in our legitimate interests or as required by law.*** We will share personal data and usage information with regulators, law enforcement agencies, public authorities, or any other relevant organisations: (i) in response to a legal obligation; (ii) if we have determined that it is necessary to share your personal data to comply with applicable law or any obligations thereunder, including

cooperation with law enforcement, judicial orders, and regulatory inquiries; (iii) to protect the interests of, and ensure the safety and security, of us, our users, a third party or the public; (iv) to exercise or defend legal claims; and (v) to enforce our terms and conditions, other applicable terms of service, or other agreements.

- ***With our affiliates, in our legitimate interests.*** We will share personal data and usage information with companies within our corporate family.
- ***In connection with an asset sale or purchase, a share sale, purchase or merger, bankruptcy, or other business transaction or re-organisation, in our legitimate interests.*** We will share personal data and usage information with a prospective buyer, seller, new owner, or other relevant third party as necessary while negotiating or in relation to a change of corporate control such as a restructuring, merger, or sale of our assets.

## **5. WHERE WE STORE YOUR INFORMATION**

Personal information may be exported outside of the jurisdiction in which you reside. Under those circumstances, the governments, courts, law enforcement or regulatory agencies of that country or those countries may be able to obtain access to your personal information through foreign laws. You need to be aware that the privacy standards of those countries may be lower than those of the jurisdiction in which you reside. You should note that you are not obliged to give your personal information to us, but if you choose not to do so, we may not be able to provide our services, or your access to our Services may be limited.

For any transfers of data outside the EEA or the UK, we will take appropriate measures in accordance with the GDPR to ensure that the recipient protects your personal information adequately in accordance with this Privacy Policy. These measures may include: entry into European Commission approved standard contractual arrangements (“Model Clauses”). Please contact [privacy@corrily.com](mailto:privacy@corrily.com) should you wish to examine a copy of the Model Clauses.

## **6. HOW LONG DO WE STORE YOUR PERSONAL DATA?**

We will retain your personal data as follows:

- your account data for as long as you keep your account open or as needed to provide you with our Services;
- if you contact us, we will keep your data for 24 months after you contact us;
- your technical usage information for 24 months; and
- data on your use of our Website and our Services is retained for 24 months.

We will also retain and use your personal data to the extent necessary to comply with our legal obligations, resolve disputes and enforce our terms and conditions, other applicable terms of service, and our policies. If you stop using our Services, we will store your information (including your end users’ information) in an aggregated and anonymized format; we may use this information indefinitely without further notice to you.

## 7. SECURITY

Although we do our best to protect your personal data, we cannot guarantee the security of your information transmitted through the Website or over email, or instant chat; any transmission is at your own risk.

## 8. CALIFORNIA RESIDENTS

This section applies to the extent that the California Consumer Rights Act (“CCPA”) is applicable. For purposes of this section, “personal information” has the meaning given in the CCPA, but does not include information exempted from the scope of the CCPA.

We do not sell personal information about you to third parties and have not done so in the past 12 months. The below table explains our practices for the past 12 months relating to the categories and types of personal information that we collect about you and the categories of third parties that we share this information with.

Category of Information	Types of Information	Categories of recipients
Identifiers	Name, email address, phone number, social media handle IP address	Cloud storage providers, CRM vendors, data analytics vendors, security vendors
Personal information listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	Name, phone number, credit/debit card information	Cloud storage providers, CRM vendors, security vendors
Internet or other electronic network activity	Browsing and search history, usage information and other information about your Internet activity and interaction with the Services	Cloud storage providers, data analytics vendors, website hosting vendors, security vendors

As a California resident, you may have the rights listed below in relation to personal information that we have collected about you. However, these rights are not absolute, and in certain cases, we may decline your request as permitted by law.

- **Right to Know.** You have a right to request the following information about our collection, use and disclosure of your personal information over the prior 12 months, and ask that we provide you with a copy of the following:
  - categories of and specific pieces of personal information we have collected about you;
  - categories of sources from which we collect personal information;
  - the business of commercial purposes for collecting personal information;
  - categories of third parties to whom the personal information was disclosed for a business purpose; and

- categories of personal information disclosed about you for a business purpose.
- **Right to Delete.** You have a right to request that we delete personal information, subject to certain exceptions.

You may make a request to know or delete by emailing [privacy@corrily.com](mailto:privacy@corrily.com). We may need to collect information from you to verify your identity, such as your email address, government issued ID or date of birth, before providing a substantive response to the request. You may designate, in writing or through a power of attorney document, an authorized agent to make requests on your behalf to exercise your rights. Before accepting such a request from an agent, we will require that the agent provide proof you have authorized them to act on your behalf, and we may need you to verify your identity directly with us.

We will not discriminate against you for exercising any of your rights under the CCPA.

## 9. EEA AND UK RESIDENTS

If you are located in the EEA or the UK, you have certain rights in relation to your personal data:

- **Access:** You have the right to access personal data we hold about you, how we use it, and who we share it with.
- **Portability:** You have the right to receive a copy of the personal data we hold about you and to request that we transfer it to a third party, in certain circumstances and with certain exceptions.
- **Correction:** You have the right to correct any of your personal data we hold that is inaccurate.
- **Erasure:** In certain circumstance, you have the right to delete the personal data we hold about you.
- **Restriction of processing to storage only:** You have the right to require us to stop processing the personal data we hold about you, other than for storage purposes, in certain circumstances.
- **Objection:** You have the right to object to our processing of your personal data.
- **Objection to marketing:** You can object to marketing at any time by opting-out using the unsubscribe/ opt-out function displayed in our communications to you.
- **Withdrawal of consent:** Where we rely on consent to process your personal data, you have the right to withdraw this consent at any time by emailing us at [privacy@corrily.com](mailto:privacy@corrily.com).

Corrily has no direct relationship with our customers' end users, whose personal data is submitted by our customers and which we process on our customer's behalf to provide the Services. Any end user who seeks to access their rights should direct their request their request to the company that it has a relationship with (as the controller). Please note that a number of these rights only apply in certain circumstances, and all of these rights may be limited by law. For example, where fulfilling your request would adversely affect other individuals or our trade secrets or intellectual property, where there are overriding public interests or where we are required by law to retain your personal data.

To exercise any of these rights, you can contact [privacy@corrily.com](mailto:privacy@corrily.com). We will respond to requests to exercise these rights without undue delay and at least within one month (though this may be extended by a further two months in certain circumstances).

## 10. CHILDREN

Our Website and Services are not intended for children, and we do not seek or knowingly collect personal data relating to children. If we become aware that we have unknowingly collected personal

data about a child, we will make commercially reasonable efforts to delete such data from our database. If you are the parent or guardian of a child who has provided us with their personal data, you may contact us to request that it be deleted.

## **11. THIRD PARTY LINKS**

Our Website may contain links to other online platforms, plug-ins or other applications operated by third parties. We do not control such other sites or applications, and are not responsible for their content, their privacy policies, or their use of your information. Information you provide on public or semi-public venues, including information you share on third-party social networking platforms, may also be viewable by other users of the Website and/or users of those third-party online platforms without limitation as to its use by us or by a third party. Our inclusion of such links does not, by itself, imply any endorsement of the content on such platforms or of their owners or operators except as disclosed on the Website. We expressly disclaim any and all liability for the actions of third parties, including but without limitation to actions relating to the use and/or disclosure of personal data by third parties. Any information submitted by you directly to these third parties is subject to that third party's privacy policy.

## **12. COMPLAINTS**

If you have complaints about how we process your personal data, please contact us at [privacy@corrily.com](mailto:privacy@corrily.com) and we will respond to your request as soon as possible.

If you are an EEA or UK resident and think we have infringed data protection laws, you can file a claim with the data protection supervisory authority in the EEA country in which you live or work or where you think we have infringed data protection laws, or with the UK Information Commissioner's Office, as applicable to you.

## **13. CONTACT**

We welcome your questions, comments, and concerns about this Privacy Policy or our processing of your personal data. Please send us any feedback to [privacy@corrily.com](mailto:privacy@corrily.com). You can also contact our CTO at [privacy@corrily.com](mailto:privacy@corrily.com).

## **14. LANGUAGE**

Except as otherwise prescribed by applicable law, in the event of any inconsistency between the English language version and local language version of this Privacy Policy, the English language version will prevail.