

PolarGrid – Privacy Policy

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PolarGrid Corporation ("**PolarGrid**", "**we**", "**us**", or "**our**"), accessible at www.polargrid.ai/ (together with its subdomains, the "**Website**"), is committed to protecting your privacy. This Privacy Policy ("**Privacy Policy**") explains how we collect, use, disclose, and safeguard information about identifiable individuals and information which can be used to identify an individual ("**Personal Information**") when you use our Website and in the course of providing our products ("**Products**"), and services (collectively, all of the foregoing the "**Services**"). This Privacy Policy should be read in conjunction with our Terms of Service, located at www.polargrid.ai/terms.

Privacy is of great importance to us. We do not actively collect Personal Information for the purpose of selling or marketing that Personal Information to third parties. Personal Information may be collected about users and visitors to the Website, as well as our customers and their end users who interact with our Services. By visiting the Website or using the Services in any manner, you acknowledge that you accept the practices and policies outlined in this Privacy Policy and you hereby consent to the collection, use and disclosure of your Personal Information in accordance with this Privacy Policy.

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1. Overview

- 1. International Users.** If you are a non-U.S. or non-Canadian user of the Services, by visiting the Services and providing us with data, you acknowledge and agree that your Personal Information may be processed for the purposes identified in this Privacy Policy. In addition, your Personal Information may be processed in the country in which it was collected and in other countries, including the United States and Canada, where laws regarding processing of Personal Information may be less stringent than the laws in your country. By providing your data, you consent to such transfer. If you are in the European Economic Area or the United Kingdom, please see specific terms which apply to you further below.

2. **Lawful Processing.** We process your Personal Information only to the extent necessary for the purposes described in this Privacy Policy. We set out below the type of Personal Information we collect and how we use such Personal Information. Except as set forth in this Privacy Policy, your Personal Information will not be used for any other purpose without your consent. You may withdraw your consent to our processing of your Personal Information at any time. However, withdrawing consent may result in your inability to continue using the Services.
3. **Scope.** This Privacy Policy covers the activities of PolarGrid but does not apply to the practices of companies that we do not own or control, including our customers and third parties that may integrate with PolarGrid Products and Services and any services offered by other companies or other sites linked from our Website or Services. This Privacy Policy does not govern any external websites or services, even if such websites or services are linked on PolarGrid's Website or through the Services. PolarGrid is not responsible for the protection of your privacy and/or any information you may provide while visiting any websites or services offered by our customers or other companies. You should exercise caution when leaving our Website and read any privacy policies that may apply to external websites or services. You are responsible for ensuring that you have obtained the necessary authorizations and consents for any Personal Information you make available to us for use in accordance with this Privacy Policy, in particular, our customers represent and warrant to PolarGrid that they have the necessary rights under applicable law or have obtained the necessary consents from each end user whose Personal Information is provided by that customer to PolarGrid in order to allow PolarGrid to use, disclose and otherwise process such Personal Information for the purposes described in this Privacy Policy in the manner described in this Privacy Policy.

2. Information We Collect

1. **Information You Provide to Us.** Set out below are some of the types of Personal Information we may collect:
 - **Personal Information we Collect from our Customers and Users.** Name, email address, password, phone number, company name, business address,

website URL, industry, time zone, business hours, and branding preferences. We may also collect billing details, payment information, or other related information in order to allow customers to pay for the Services they have procured from PolarGrid.

- **Personal Information Collected in the Course of Offering the Services.** We may collect Personal Information from any users that interact with our Services. Personal Information collected may include names, phone numbers, email addresses, addresses, service preferences, and notes. We may also collect phone call recordings and/or transcripts, voice messages, and related communication data to provide support to our customers and users.
- **De-Identified Data.** We may also collect and use de-identified data, including aggregated and de-identified statistical datasets and analysis (“**De-Identified Data**”), from your interaction with and use of the Services. De-Identified Data may be derived from your personal information but is treated as de-identified or anonymized data in accordance with applicable law, meaning that it is not used to directly or indirectly reveal your identity. Where we de-identify data, we maintain it in de-identified form and do not attempt to re-identify it except as permitted by law. For example, we may anonymize and aggregate your usage data to calculate the percentage of users accessing a specific feature of the Services.
- **Information Received from Third-Party Services.** If a user integrates any Third-Party Services with PolarGrid’s Services, Personal Information may be received by PolarGrid as configured by such user.
- **Employee and Contractor Candidate Information.** When we seek candidates for potential jobs or contracting engagements with PolarGrid, we collect information that those candidates choose to provide to us when applying, which may include contact information, education and employment history, credentials, place of residence and other information the candidate believes to be relevant. For people who become our employees or contractors, we will typically retain the information provided by those candidates in the application process along with additional information to

manage their employment or contractor relationship with us, including, without limitation, information related to income tax reporting and withholding and enrollment in PolarGrid benefit plans (in each case, to the extent applicable for the relevant relationship).

2. **Information We Collect Automatically.** Set out below are some of the types of information that we may collect automatically while you visit, use, or access the Website and/or during the course of providing the Services:

- **Device Information.** We may collect information about devices you use to access the Services and information about how you use the Services, such as your IP address and which websites you visited before accessing our Services.
- **Usage Data.** Our servers automatically record information created by your use of our Services to help us diagnose and fix technical issues, and to improve the overall quality and user experience of our Services. Usage Data may include information such as your IP address, browser type, operating system, details of how you used our Services (such as the functions you asked our Services to perform), diagnostic information related to the Services (such as crash activity reports), the referring web page, pages visited and time spent on such pages, location, your mobile carrier, device and application IDs, search terms, cookie information, and interaction patterns.
- **Cookies.** We use tracking technologies like cookies and pixel tags to gather information about how you are interacting with the Services, which may include identifying your IP address, browser type, and referring page. We also use these technologies to remember your preferences and settings, understand how users interact with the Website and/or the Services, analyze and improve Services (including collecting anonymized usage statistics), and to provide secure authentication. You may control cookies through browser settings, however, disabling cookies may limit or completely disable certain features of the Website and/or the Services.

- **Marketing Information.** From time to time, we may conduct surveys or hold contests or other events and in connection with such surveys, contests, or events, we may collect information you elect to provide about yourself, such as your name, email address, telephone number, organization name and address; and general information about the company for whom you work. In addition, we may use third-party service providers to collect business-related information about your employer such as its name, size, and publicly available revenue in connection with potentially offering the Services to your employer.

3. How We Use Your Information

We may use the information we collect from you in a manner consistent with this Privacy Policy and the context of our relationship with you. We may use the information that we collect through the Services for the following purposes:

- provide, operate, maintain, improve, and personalize the Website and the Services;
- send technical notices, updates, security alerts, and support/administrative messages;
- respond to comments, questions, and requests and provide customer service and support;
- process and manage accounts and subscriptions related to the Services;
- process your authorized payments for our Services;
- monitor and analyze trends, usage patterns, activities, and performance metrics in connection with the Services, including generating aggregated and de-identified statistics;
- process communications using automated systems, including artificial intelligence, to understand intent, generate responses, create summaries, and assist with service delivery;
- investigate and prevent unauthorized access to the Services, fraud, and other illegal activities;
- internal record keeping;

- communicate with you and provide news or information about us or new products, special offers, or other information we think you may find useful or interesting;
- conduct business and contractual relationships that we have with various persons and companies (such as customers, suppliers, partners and employees);
- from time to time, to contact you for market research purposes;
- comply with our legal obligations and enforce the terms of our agreements;
- for other purposes which we will notify you about and seek your consent; and
- as otherwise specifically described in this Privacy Policy.

4. Information Sharing and Third Parties

We do not actively collect Personal Information for the purpose of selling or marketing that information to third parties.

1. **Service Providers and Business Partners.** We may from time to time employ third parties to perform tasks for us (“**Sub-Processors**”) and we may need to share Personal Information (including account information) with them to perform those tasks. Unless we tell you differently, such Sub-Processors process your Personal Information only in accordance with our instructions and applicable law, and they do not have any right to use the Personal Information we share with them beyond what is necessary for them perform the relevant tasks for us. The Sub-Processors we currently engage include third-party companies and individuals employed or contracted by us to provide certain capabilities within the Services and for certain general business functions, including the provision of AI models for processing, phone call and SMS messaging services, database management, user authentication, payment processing, web hosting and analytics (including advertising analytics), and customer relationship management tools.
2. **Legal Requirements.** We may disclose your Personal Information to third parties without your consent if we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other users, or anyone else (including the rights or property of anyone else) that could be harmed by such activities. Further, we may disclose

Personal Information when we believe in good faith that such disclosure is required by and in accordance with the law.

We also reserve the right to access read, preserve, and disclose any information as we reasonably believe is necessary to:

- Satisfy any applicable law, regulation, legal process or governmental request (including in pursuant to subpoenas, civil investigative demands, or similar processes); enforce our contracts or user agreements, including investigation of potential violations hereof; and
- Detect, prevent, or otherwise address fraud, security, or technical issues.

The above may include exchanging information with other companies and organizations for fraud protection, spam/malware prevention, and know-your-customer purposes. Notwithstanding the general terms of this policy, the collection, use, and disclosure of Personal Information may be made outside of the terms of this Privacy Policy to the extent provided for in any applicable privacy or other legislation in effect from time to time, or pursuant to court orders (including in respect to depositions, interrogatories, subpoenas, civil investigative demands, and other court or regulatory-mandated discovery processes).

3. **Business Transfers.** If PolarGrid is involved in a merger, acquisition, sale of all or substantially all of its assets, or if PolarGrid goes out of business, enters bankruptcy, or goes through some other change of control, Personal Information may be transferred as part of that transaction. Your Personal Information may also be transferred in connection with due diligence for any such transactions. In all cases, if any such transactions occur, your Personal Information will remain subject to the restrictions and protections set forth in this Privacy Policy.
4. **With Your Consent.** If we need to use or disclose any Personal Information in a way not identified in this Privacy Policy, we will notify you and/or obtain consent as required under applicable privacy laws.

5. Data Storage and International Transfers

PolarGrid processes and stores its data, including Personal Information, on servers located in Canada and the United States. PolarGrid also transfers data to third-party service providers, including Sub-Processors. You agree to this transfer, storing or processing of your Personal Information in Canada and the United States. Where we transfer Personal Information of individuals in the EEA or the UK to a country that has not been recognized as providing an adequate level of protection, we rely on an approved transfer mechanism, such as the European Commission's Standard Contractual Clauses (together with the UK International Data Transfer Agreement or Addendum), and implement any supplementary measures required by applicable law. We take steps to ensure appropriate safeguards are in place in accordance with applicable law, however, you acknowledge and agree that your Personal Information may be accessible to law enforcement and governmental agencies in Canada and the United States under lawful access regimes or court order.

6. Data Retention

We retain your Personal Information for as long as it remains necessary for the identified purpose or as required by law, to resolve disputes, and to enforce agreements, which may extend beyond the termination of our relationship with you. We may retain certain data as necessary to prevent fraud or future abuse, or for legitimate business purposes, such as analysis of aggregated, non-personally-identifiable data, account recovery, or if required by law. All retained Personal Information will remain subject to the terms of this Privacy Policy.

Business customers may configure retention settings within the Services, subject to minimum retention periods required by law or legitimate business purposes.

Upon account deletion, personal information is deleted or de-identified within 30 days, except where retention is required by law or legitimate business needs.

7. Data Security

We implement appropriate physical, technical, and organizational safeguards to protect Personal Information and other data that we collect, including:

- Encryption in transit using TLS/SSL.
- Encryption of sensitive data at rest.
- Access controls and authentication requirements.

- Regular security assessments and updates.
- Employee training related to data protection and security.

No method of transmission or storage is completely secure, and we cannot guarantee the absolute security of your data.

8. Your Rights: Access, Correction, and Accuracy

Depending on your location, you may have rights regarding your personal information, including:

- **Access.** Request access to Personal Information we hold about you in order to verify the Personal Information we have collected in respect of you and to have a general account of our uses of that Personal Information. Upon receipt of your written request, we will provide you with a copy of your Personal Information, although in certain limited circumstances, and as permitted under law, we may not be able to make all relevant Personal Information available to you, such as where that Personal Information also pertains to another individual. In such circumstances, we will provide reasons for the denial to you upon written request.
- **Correction.** We will make every reasonably effort to keep your Personal Information accurate and up to date, and we will provide you with mechanisms to update, correct, or add to your Personal information as appropriate. You may also request an update or correction of inaccurate or incomplete information in writing.
- **Deletion.** We will provide you with mechanisms to delete your Personal Information, as appropriate. You may also request deletion of your Personal Information or withdraw your consent to our collection of your Personal Information. Deletion of Personal Information and withdrawal of consent is subject to exceptions and may affect our ability to provide you with services and/or require you to discontinue your use of certain PolarGrid products or services.
- **Data Portability.** You may request a copy of your data in a structured, machine-readable format in writing.

- **Opt-Out.** You may opt-out of marketing communications at any time by clicking the “unsubscribe” button included in such communications or by submitting a written request.

All requests pertaining to Personal Information should be submitted in writing to henry@polargrid.ai. As appropriate, amended Personal Information will be transmitted to those parties to which we are permitted to disclose your Personal Information. Having accurate Personal Information about you enables us to give you the best possible service.

9. Residents of the European Economic Area (“EEA”) and the United Kingdom (“UK”)

If you are a resident of the EEA or the UK, you have certain data protection rights. PolarGrid takes reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Information (known as “**Personal Data**” under the EU General Data Protection Regulation and under the UK Data Protection Act 2018).

If you wish to be informed about what Personal Data we hold about you and if you want that Personal Data to be removed from our systems, please contact us using the contact information set out below. Note that where we act as a data processor on behalf of our customers, you will be required to contact the data controller directly to exercise your rights.

In certain circumstances, where we act as data controller, you have the following data protection rights:

- 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 where we are the data controller 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 information we hold about you corrected, though we may need to verify the accuracy of the new information 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 to continue 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 particular 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: (a) if you want us to establish the information's accuracy; (b) where our use of the information is unlawful but you do not want us to erase it; (c) where you need us to hold the information even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your information 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 services to you. We will advise you if this is the case at the time you withdraw your consent.

Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local Data Protection Authority. If you wish to exercise any of the rights set out above, please contact us using the contact details below.

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it.

We may also contact you to ask you for further information in relation to your request to speed up our response.

10. California Privacy Rights

This section provides additional details about the Personal Information we collect about California consumers and the rights afforded to them under the California Consumer Privacy Act (the “**CCPA**”).

For more details about the Personal Information PolarGrid has collected over the last 12 months, please see the Section “Information You Provide to Us” above. We collect this Personal Information for commercial purposes described above. PolarGrid does not sell or share (as those terms are defined in the CCPA, as amended by the CPRA) the Personal Information we collect. California consumers also have the right to correct inaccurate Personal Information, to limit the use and disclosure of sensitive Personal Information, and to opt out of the “sharing” of Personal Information for cross-context behavioral advertising, in each case as provided under applicable California law.

Subject to certain limitations, the CCPA provides California consumers the right to request to know more details about the categories or specific pieces of Personal Information we collect about them (including how we use and disclose this Personal Information), to delete their Personal Information, to opt out of any “sales” of Personal

Information that may be occurring, and to not be discriminated against for exercising these rights.

California consumers may make a request pursuant to their rights under the CCPA by contacting us at the contact information below. We will verify your request using the information (including Personal Information) associated with your account, if available, including email address. Government identification may be required. Consumers can also designate an authorized agent to exercise these rights on their behalf.

11. Canadian Privacy Compliance

PolarGrid complies with the Personal Information Protection and Electronic Documents Act (“**PIPEDA**”) and applicable provincial privacy legislation, including Quebec's Act respecting the protection of personal information in the private sector (as amended by Law 25) and the personal information protection legislation of British Columbia and Alberta. Where required by such legislation, this includes maintaining a designated person responsible for the protection of personal information, notifying affected individuals and the relevant regulator of confidentiality incidents that present a risk of serious injury, and providing transparency about decisions based solely on automated processing of Personal Information.

We adhere to the principles of accountability, identifying purposes, consent, limiting collection, limiting use and retention, accuracy, safeguards, openness, individual access, and challenging compliance.

Concerns regarding compliance with PIPEDA or provincial privacy legislation may be directed to our Privacy Officer.

12. Anti-Spam Compliance

We comply with Canada's Anti-Spam Legislation (“**CASL**”) and the United States’ CAN-SPAM Act of 2003. We do not sell or transfer email addresses for marketing purposes and honor unsubscribe requests promptly.

13. Changes to This Privacy Policy

This Privacy Policy is effective as of the Effective Date stated above. We may update this Privacy Policy periodically and at our sole discretion to reflect changes in our practices or legal requirements. Processing of Personal Information we collect is subject to the Privacy Policy in effect at the time such Personal Information is collected, used or disclosed as this Privacy Policy may subsequently be updated in accordance with this Section. Material changes to this Privacy Policy will be posted on our Website, via the Services, or by sending you an email prior to the change becoming effective, which will be evidenced by updating the Effective Date above. Continued use of the Services after

we make any changes to the Privacy Policy constitutes acceptance of the updated Privacy Policy and agreement to be bound by such changes. Please refer back to this Privacy Policy regularly to remain informed about our practices in relation not Personal Information.

14. Contact Us

PolarGrid Corporation

Chief Operating Officer: Henry Chen

Email: henry@polargrid.ai

We will respond to inquiries within a reasonable timeframe and no later than 30 days as required by applicable privacy legislation