

## Seamless.AI CCPA Policy

Last Updated: February 7, 2023

If you are a California resident, you may have rights under the California Consumer Privacy Act (CCPA) that this policy addresses. You may print or download a [pdf version of this policy](#).

### **A. We may collect the following categories of personal information about you.**

Seamless.AI may collect the following categories of personal information about you (followed by examples from each category):

- 1. Identifiers.** Examples include name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.
- 2. Personal information described in California Civil Code Section 1798.80(e).** Examples include signature, telephone number, education, employment, employment history, and bank account number or other financial information (if you make payments to us).
- 3. Characteristics of protected classifications under California or federal law.** Examples include age or gender.
- 4. Commercial information.** Examples include products or services purchased, obtained, or considered.
- 5. Biometric information.** Seamless.AI does not collect biometric information about you.
- 6. Internet or other electronic network activity information.** Examples include your interactions with internet websites, applications, or databases.
- 7. Geolocation data.** Seamless.AI does not collect geolocation data about you.
- 8. Audio, electronic, visual, thermal, or olfactory information.** Seamless.AI does not collect audio, electronic, visual, thermal, or olfactory information about you.
- 9. Professional or employment-related information.** Examples include education information, job responsibilities, title, and employer.
- 10. Education information.** Examples include resume information, schools attended, certifications obtained, or training.
- 11. Inferences.** Examples may include inferences relating to preferences, characteristics, behavior, and attitudes.
- 12. Sensitive personal information.** Examples include account log-in and password information.

### **B. We collect your personal information for business and commercial purposes.**

We may collect your personal information for the following purposes, among others:

1. For our business purposes, including processing your requests, inquiries, or other communications with us;
2. To process and manage transactions and payments;
3. For auditing;
4. To help maintain the safety, security, and integrity of our technology assets and business;
5. For short-term, transient use of personal information;
6. For the development, improvement, or provision of products or services on behalf of Seamless.AI, another business, or a service provider, including maintaining or servicing accounts or providing customer service;
7. To undertake internal research;
8. To verify or maintain the quality of our products or services or improve them;
9. For marketing and advertising;
10. To resolve disputes and enforce our agreements; and
11. To respond to law enforcement, governmental, or other legal requests and as required by applicable law.

**C. We may collect information from you from various sources, including you and our service providers.**

We may collect personal information about you from the following sources, among others:

1. Directly from you;
2. From third parties, including those to whom you have previously provided information;
3. From our service providers;
4. From publicly available sources;
5. From our browser plugins; and
6. From professional networking, customer relationship management, or social media platforms.

**D. We may disclose your personal information for our business purposes, to comply with applicable law, and for other purposes.**

We may disclose your personal information for the following purposes, among others:

1. For our business purposes, including providing our services, processing your or our customers' requests, inquiries, or other communications with us;
2. For verification services;

3. To provide you with financial services;
4. To protect the rights of Seamless.AI, its employees, service providers, assets, business, partners, or others; and
5. To respond to law enforcement, governmental, or other legal requests and as required by applicable law.

We may disclose your personal information to our affiliates and subsidiaries, to third parties who provide us with services to fulfill the purposes described in this policy, in the event Seamless.AI is involved in a merger, acquisition, or sale or transfer of all of its assets, as otherwise required by law, and for other purposes.

**E. We may sell or share your personal information.**

We may “sell” (as that term is broadly defined under the California Consumer Privacy Act) the following categories of personal information to third parties such as our customers, data brokers, data aggregation services providers, or other third parties: (i) identifiers, such as your name, (ii) personal information described under Civil Code 1798.80(e), such as your phone number, (iii) characteristics of protected classification, such as age or gender, (iv) commercial information, (v) professional employment information, (vi) education information, and (vii) inferences.

We may sell or share your personal information for cross-context behavioral advertising purposes.

We do not knowingly sell the personal information of minors under sixteen years of age. We do not sell your financial information when you make payments to us.

**F. We may retain your personal information in accordance with our legal obligations.**

Generally, we retain your personal information for the period reasonably necessary to provide our services and for other disclosed purposes, pursuant to our records retention policies and as otherwise required by applicable law.

**G. You have rights regarding your personal information, including the right to access, correct, and delete.**

You may have the following rights with respect to your personal information:

1. **Notice.** The right to notice about our collection, use, disclosure, sale, or sharing of information about you. This policy is intended to satisfy this right.
2. **Access.** The right to request access to your personal information, including the specific pieces of personal information that we have about you and information about any automated decision-making, including profiling, about you made by Seamless.AI. You may use [this personal information request form](#) to request access to your personal information or call us at 855-953-3265.

3. **Correct.** The right to request that we correct your personal information. You may use [this personal information request form](#) to request correction of your personal information or call us at 855-953-3265.
4. **Delete.** The right to request that we delete the personal information we have collected about you. You may use [this personal information request form](#) to request the deletion of your personal information or call us at 855-953-3265. Please note that specific laws may require that we retain personal information in particular circumstances.
5. **Opt out.** The right to opt out of the sale or sharing of your personal information to third parties. You may do so by using [this personal information request form](#) or calling us at 855-953-3265. You may also opt-out of online behavioral advertising and analytics, which may be considered to be a sale under applicable laws, by using our website cookie banner and opting out of applicable cookies.
6. **Limit the use of sensitive personal information.** The right to ask us to limit our use of your sensitive personal information. There is no need for you to ask us to limit the use of your sensitive personal information because we do not use your sensitive personal information beyond what is required to conduct business, provide services to you, and as otherwise required or permitted by law.
7. **Portability.** The right to obtain a copy of your personal information in an easily understandable and portable format that you may also request be transmitted to another entity. You may use [this personal request form](#) to request access to your personal information or call us at 855-953-3265.
8. **Automated decision-making and profiling.** The right to opt out with respect to our use of automated decision-making technology, including profiling. There is no need for you to opt out of automated decision-making technology, including profiling, because we do not use automated decision-making, including profiling, (as those terms are defined under applicable laws) with respect to your personal information.
9. **Appeals.** Seamless.AI does not currently offer a right to appeal.
10. **Non-retaliation.** The right to be free from retaliation for exercising any of these rights.

In order to exercise your rights relating to access, correction, and deletion, we need to verify your identity. When you submit a request to access, correct, or delete your personal information, you will need to provide us with adequate information so that we may match you in our records. We will also send you an email to confirm that you have access to your email to verify your identity. If we are unable to match you in our records and verify your identity, we may be unable to provide you with access to your personal information or correct or delete your personal information.

Seamless.AI does not offer financial incentives for the collection, retention, or sale of personal information and does not have financial incentive programs for you to opt into.

**H. You may have the right to designate an authorized agent to act on your behalf.**

You may have the right to designate an authorized agent to make a request on your behalf. We must receive a signed letter from you that describes you, your designated authorized agent, and the purpose of the designation. Your designated agent may then use the access, correction, deletion, and opt-out links described above to make a request on your behalf. In addition, we must still be able to verify your identity before you may access, correct, or delete your personal information.

**I. We may revise this policy.**

We may update this policy in accordance with applicable law, including by posting a revised policy on the website that hosts this policy.

**J. You may contact us.**

If you have any questions or concerns about this policy or your rights, you may contact us by calling us at 855-953-3265.

**K. Answers to frequently asked questions.**

**1. What is Seamless.AI's privacy policy?**

You may read the [Seamless.AI Privacy Policy](#) and the [California Consumer Privacy Act Policy](#). Depending on your relationship with us, one or both of these privacy documents may apply to you.

**2. What are my rights under the California Consumer Privacy Act?**

You may have the rights of notice, access, correction, deletion, opt out of sale, sharing, or automated decision-making, limiting the use of your sensitive personal information, portability, and non-discrimination. You may find additional information about these rights in our California Consumer Privacy Act Policy referenced above.

**3. Does Seamless.AI charge a fee to respond to requests under CCPA?**

Generally, no. However, we may charge a reasonable fee for or refuse to act on requests that are manifestly unfounded or excessive, including repetitive requests. If we refuse to act on a request, we will notify you of the reason.

**4. How long will it take to process my request?**

We try to verify and complete requests within 45 days. In some cases, it may be necessary to extend the time frame. We will notify you if additional time is needed.

**5. Does my personal information access report include everything you have about me?**

Seamless.AI strives to provide access to personal information about each individual. However, there are some cases where applicable laws make exceptions, including those cases where we are required to comply with other applicable laws.

## **6. What happens when I request that you delete my data?**

We process your deletion request in accordance with our legal obligations and related data retention policies.

Please note that, under the CCPA, we are not required to comply with your request to delete your personal information if it is necessary for Seamless.AI to maintain your personal information in order to:

- (1) Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between Seamless.AI and you;
- (2) Help to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for those purposes;
- (3) Debug to identify and repair errors that impair existing intended functionality;
- (4) Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law;
- (5) Comply with the California Electronic Communications Privacy Act;
- (6) Engage in public or peer-reviewed scientific, historical, or statistical research that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, if you have provided informed consent;
- (7) Enable solely internal uses that are reasonably aligned with a consumer's expectations based on their relationship with Seamless.AI; or
- (8) Comply with a legal obligation.

Please note that, as permitted under the CCPA regulations, we may retain your personal information in our backup or archived systems until the retention period of those systems expires.

## **7. What about deidentified information?**

Seamless.AI may deidentify or aggregate your personal information in compliance with the CCPA. In those instances, we are not obligated to provide access to, correct, or delete this information in response to a request.

## **8. How long do you retain the information about my request?**

We retain the information relating to your request in accordance with our legal obligations and records retention policies. We will maintain, for a minimum of 24 months, a record of your request, as required under the CCPA.

**9. How many requests may I make in one year?**

You may make two requests to access your personal information in a 12-month period under the CCPA. You may make more than two requests; however, we are not required under the CCPA to respond to them.