

SEAMLESS AI CALIFORNIA CONSUMER PRIVACY ACT POLICY

Last Updated: July 1, 2020

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. Collection of Information

Seamless AI may collect the following categories of personal information about you:

- Personal identifiers and information, such as name, age, address, email address, work address, phone numbers, and financial information (if you make payments to us);
- Internet, browsing, or other network information, (if you use our websites) such as internet protocol address, session ID, click or touch stream data, movement, scroll, and in some cases, keystroke activity;
- Professional or employment information, such as your role, title, or employer; and
- Education information, such as certifications, training, or schools attended.

B. Sources of Information

For all categories of personal information mentioned above, the sources of personal information include you; publicly available databases; our browser plugins; or professional networking, customer relationship management, or social media platforms.

C. Purposes of Collection of Information

We collect, use, and "sell" personal information for our business and commercial purposes. For all categories of personal information listed in this policy, our business purposes include:

1. Auditing;
2. Detecting security incidents;
3. Protecting against and prosecuting malicious, deceptive, fraudulent, or illegal activity;
4. Debugging;
5. Short-term, transient use of personal information;
6. Performing services on behalf of Seamless AI, another business, or a service provider (such as maintaining or servicing accounts or providing customer service);
7. Undertaking internal research; and
8. Verifying or maintaining the quality of our products or services or improving them.

Other examples of our business and commercial purposes include provision of our products or services, developing or improving our services, and marketing or advertising.

We also collect and use all categories of personal information listed in this policy to comply with our legal obligations, resolve disputes, enforce our agreements, and for other purposes described to you at the point of collection of your personal information.

D. Sharing of Information

We may “sell” (as that term is broadly defined under the California Consumer Privacy Act) personal information that relates to the categories of personal identifiers and information, professional or employment information, and education information to third parties such as our customers, data brokers, data aggregation services providers, or other third parties.

We also share all categories of your personal information for the business purposes listed above with our service providers. Those service providers include information technology services providers, advertising and marketing service providers, consultants, accountants, attorneys, and others with whom we are permitted by law to share.

Seamless AI may also share all categories of personal information as part of corporate transactions, such as mergers, acquisitions, or divestitures, as well as with our affiliates and subsidiaries. We may be required to share all categories of personal information with law enforcement, regulatory agencies, or litigants based on enforceable requests for this information.

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

E. Your Consumer Rights

You may have a right to notice, non-discrimination, access, opt-out, and deletion.

1. **Notice.** You may have the right to know about the personal information collected, used, disclosed, or sold. This policy is intended to satisfy this right.
2. **Non-discrimination.** You may have the right not to be discriminated against for exercising any of the rights in this section.
3. **Access.** You may have the right to access your personal information. You may use [this personal information access request form](#) to request access to your personal information or call 1-646-736-2200.
4. **Opt-Out.** You may have the right to direct us not to sell your personal information to third parties. You may do so by using [this personal information opt-out form](#) or calling us at 1-646-736-2200.
5. **Deletion.** You may have the right to request that we delete the personal information we have collected about you. You may use [this personal information deletion request form](#) to request the deletion of your personal information or call 1-646-736-2200.

In order to exercise your rights relating to access and deletion, we need to verify your identity. When you submit a request to access 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 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.

F. Authorized Agent

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, 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 or delete your personal information.

G. Updates

We may update this policy from time to time as permitted by applicable law. When we update it, we will post the updated policy on this page and change the "last updated" date on the policy. If we make material changes to it, we will notify you either by a prominent notice on our website before the changes take effect or emailing you about those changes.

H. Contact Us

If you have any questions or concerns about this policy or your rights, you may contact us by email at privacy@seamlessleads.com or by calling 646-736-2200.

I. Frequently Asked Questions

1. What is Seamless AI's privacy policy?

You may read the [Seamless AI Privacy Policy](#) and their [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, non-discrimination, access, opt-out, and deletion. 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?

Almost. However, there are certain categories of personal information that are exempt from access under the CCPA.

For example, please note that the CCPA regulations do not require us to search for personal information if we:

- Do not maintain the personal information in a searchable or reasonably accessible format;
- Maintain the personal information solely for legal or compliance purposes; and
- Do not sell the personal information and do not use it for any commercial purpose.

The types of records we did not search include records relating to litigation, unstructured paper records, and other categories.

As a result, these types of personal information or records, if they exist, are not included in your personal information access report.

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

We delete your data subject to 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, 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) Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity;
- (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 in the public interest 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;
- (8) Comply with a legal obligation; or

(9) Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

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 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 and schedules. We will maintain, for a minimum of 24 months, a record of your request, as required under 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.