

Conversifi Privacy Policy

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1. General

Hello, and welcome to Conversifi!

We are committed to earning and maintaining your trust, and so we design our Services (as defined below) with privacy in mind. We aim for this Conversifi Privacy Policy (“**Privacy Policy**”) to be as transparent as possible, so you understand how we collect, use, and disclose information about visitors to our Site and users of our Services.

Please note that: (i) in this Privacy Policy: (a) even though our legal name is SpeakApp Inc. d/b/a Conversifi, we refer to ourselves as “**Conversifi**” or “**we**”; (b) we refer to our conversifi.com domain, our www.conversifi.com website within/under such domain, our web-based app.conversifi.com application within/under such domain, and the Conversifi products and services we make available within/under such domain, individually and collectively, as our “**Site**” or our “**Services**”; (c) we refer to visitors to our Site and users of our Services (including “learners” and “coaches” who engage in “conversations” via our Services) as “**users**”; (d) we refer to such conversations as “**Conversations**”; and (e) we refer to information that constitutes “personal data” or “personal information” (or another term with a substantially similar definition and obligations) under applicable data protection law as “**Personal Data**”; and (ii) when used in this Privacy Policy, the term “including” (as well as related terms such as “include” and “includes”) means “including, but not limited to,” and is meant to be inclusive, not exclusive. To the extent permitted by applicable law, by accessing and/or using our Site, you are agreeing to the data collection, use, disclosure, and other processing described in this Privacy Policy.

Please read this Privacy Policy carefully. This Privacy Policy forms part of our Conversifi Terms of Use (“**Terms of Use**”). To read our Terms of Use, please click [HERE](#).

2. Information We Collect

Please note that, in this Privacy Policy, the word “collect” (and its cognates, such as “collection” and “collected”) should be read broadly, as it is intended to refer to any process or method that we may use to gather, access, or acquire information, including (as described in greater detail below in this Section 2) information a user submits or provides to us, information collected in connection with a user’s accessing or interacting with our Site, and information we obtain from third parties.

Data Collected through User Submissions or Conversations

General

We collect information that you submit to us, including via your account with us (a “**Conversifi Account**”) (such as via registration or purchase activities), via your use of our Conversation Services, via email, and via your communications and interactions with our customer support team (including via email and/or customer support technology on our Site), in particular the following:

- **Account Data:** If and when you create or update a Conversifi Account with us, we collect certain information, which may include your name (both first and last name), email address, phone number, city, state/province, and/or country, date of birth, Conversifi username/handle and password, photograph, native language, country where your native language was learned, other demographic data, and language course and/or institution information (“**Account Data**”).
- **Conversation Data:** We record and may transcribe Conversations as part of our Services, and we collect data from and/or associated with such Conversations (“**Conversation Data**”).
- **Posted Data.** We collect data from non-Conversation content, images, information, materials, and comments that you post to our Services.
- **Other Submitted Data:** We collect any other information that you provide to us, including via email, in chats conducted during your Conversations, and via your communications and interactions with our customer support team (including via email and/or customer support technology in or on our Services). For example, if you send us an email or include your email address in a communication to us, we collect your email address and any other information you provide in your email or other communication.

Third-Party Payment Processing Providers

We use one or more third-party payment processing providers (e.g., PayPal or Stripe) in connection with our Services. If you provide your financial account number (such as credit card number or debit card number) in connection with your online purchase (or attempted online purchase) of our Services, please be aware that: (i) you are providing such financial account number to the applicable third-party payment processing provider (not to Conversifi); (ii) Conversifi does not access, store, or otherwise process such financial account number; and (iii) the processing of such financial account number and any and all other data required or otherwise collected by such third-party payment processing provider (such as name, email address, phone number, postal address, commercial information, etc.) is subject to the applicable terms, conditions, and policies of such third-party payment processing provider (each of which may be modified from time to time by such third-party payment processing provider). We may receive from, and provide to, the payment processing provider a randomly generated payment transaction identifier in connection with your Services purchases/payments.

Data Collected through User Visits and Interactions

Use of Cookies, Pixels, and Similar Technologies

We use cookies, pixels, and similar online technologies to collect information, including to understand user activity on our Site and to help improve users’ experiences while using our Site. We may also use such technologies in emails, including to help us track email response rates, identify when our emails are viewed, and track whether our emails are forwarded.

A cookie is a small alphanumeric text file sent by a web server and placed on your computer by your web browser. Cookies are often used in conjunction with other technologies to understand online behavior. For example, we use cookies in conjunction with pixels, which are small snippets of code, to associate particular

online activities to a browser or device (e.g., to understand that a browser or device has visited a specific page of our Site and/or to understand the total number of unique users that have visited our Site).

We use cookies, pixels, and similar technologies for our commercial and operational purposes, including for customizing users' experiences and interactions, for measurement and analytics with respect to users' activities, for troubleshooting purposes, and for fraud prevention and detection and other security purposes.

You may set your browser to refuse cookies or third-party cookies or to indicate when a cookie is being set. However, if you do not accept cookies, parts of our Site may function differently and you may not be able to use some portions or features of our Site. For more information about how to manage your cookies and your cookie preferences, please use the "help" menu of your web browser or explore the customer support sections of your web browser.

Usage Data

Some of the data we collect consists of passive data concerning your device and how you access and use our Site ("**Usage Data**"). This Usage Data includes information such as your computer's Internet Protocol address, browser type, and browser version, as well as the pages of our Site that you visit, the times and dates of your visits, the time spent on, and interactions with, those pages, location data, and diagnostic data. You can enable or disable location services when you use our Site at any time, through your device settings. We may use Usage Data to provide, maintain, and improve our Site, including to understand users' activities on our Site, to help improve users' experience while using our Site, to strengthen the security of our Site, and to improve the functionality of our Site.

Third-Party Controller Personal Data

We may use the services of third-party vendors (including in connection with our use of cookies, pixels, and similar technologies) that control the collection of Personal Data on our Site (such collected Personal Data, "**Third-Party Controller Personal Data**"); such vendors may include our third-party payment processing providers. In addition to our use of Personal Data (including Third-Party Controller Personal Data) described in this Privacy Policy, such third-party vendors may use Third-Party Controller Personal Data for their own purposes (which, to be clear, are different from our use purposes set forth in this Privacy Policy). We have no control over and assume no responsibility for the privacy policies or data practices of such third-party vendors. To learn more about PayPal's processing of information (including information that may be collected on our Site through PayPal's payment-processing service), please visit <https://www.paypal.com/us/legalhub/paypal/privacy-full>; and to learn more about Stripe's processing of information (including information collected on our Site through Stripe's payment-processing service), please visit <https://stripe.com/privacy>. To the extent permitted by applicable law, by using our Site, you are agreeing to data collection, use, and other processing by our third-party controller vendors.

3. How We Use Your Information

If and as permitted by applicable law, we use the information (including Personal Data) we collect for our commercial and operational purposes, which may include:

- **Providing, Maintaining, Training, Improving, and Developing Conversifi's Services** (including to develop new products, services, and/or features; to train and develop our automated (including AI and other machine learning powered) technologies, software, models (including large language models), and algorithms; to authenticate users; to assess the Conversation-related performance of "learners" and "coaches"; to generate transcripts from Conversations; to perform technical operations, such as updating software; and for support purposes)
- **Services Monitoring, Research and Analytics** (including to measure and analyze how you and other users use and interact with our Services, to determine how to enhance the usability and

performance of our Services, to detect and prevent fraud, security breaches, and/or other misconduct, and for other research, analytics, and statistical purposes)

- **Communications** (including to communicate with you about your Conversifi Account, our Services, and Conversifi Service promotions and to respond to your inquiries)
- **Customization** (including to tailor the content and information that we may send or display to you, and to otherwise customize your experiences while using our Services)
- **Internal Financial, Employment, and Administrative Purposes**
- **Other Services-Related Performance Purposes** (including to manage and perform under our contractual relationships, and to investigate, manage, and resolve complaints and claims)
- **Protecting Rights, Safety, and Interests** (e.g., of Conversifi, its affiliates, its users, third parties, and/or the general public)
- **Compliance with Legal/Regulatory Obligations**

In addition, in instances where we collect your Personal Data, we may de-identify such Personal Data, in particular by removing or altering information that can reasonably be used to identify you (e.g., name, phone number, email address, voice and/or face, etc.). We may use aggregate and/or de-identified data for any purpose (including any or all of the purposes set in this Privacy Policy).

4. How We Disclose Your Information

If and as permitted by applicable law, we may disclose information (including Personal Data) for our commercial and operational purposes, in particular in the following ways:

- **To Conversifi Users:** We may disclose information to other Conversifi users, including your Conversifi username/handle, your first name, your city, state/province, and/or country, the country where you learned the relevant language of discussion, the photo(s) you include for your Conversifi Account, your feedback on a Conversation, your posts made to our Services, and other comments and/or material(s) you provide to Conversifi. If you engage in Conversations with other Conversifi users, then your information, including your Conversations and transcripts generated from your Conversations, may be provided or made available to those users.
- **To Third-Party Organizations:** If you use our Services in connection with an educational institution, employer, or other organization (each, a “**Third-Party Organization**”), or a course or program thereof, we may disclose information to such Third-Party Organization and/or individuals associated with such Third-Party Organization, including certain of your Account Data and information about your use of our Services, including as may be elected or directed by you in your Conversifi Account or otherwise in our Services.
- **To Vendors:** We may disclose information to vendors that perform certain services on our behalf. These services may include developing, maintaining, and improving our Services functionality and features and underlying technology; providing customer support (including through customer support technology on our Site); analyzing the Conversation-related performance of users; performing de-identification services; processing payments; performing business and operational analyses; and performing financial, employment, or administrative services. These vendors may have access to, and may process, Personal Data in order to perform services on our behalf.
- **Licensing Transactions: We will not license your Personal Data in any Licensing Transaction(s).** Only after data and/or materials have been aggregated and/or de-identified by removing or altering information that can reasonably be used to identify users, we may license to third parties recordings of Conversations, transcripts generated from Conversations, and/or other

products and materials (e.g., models) derived from the foregoing (collectively, “**Conversation Materials**”). For clarity, pursuant to such “**Licensing Transactions**”, third-party licensees (e.g., textbook publishers, language instruction application providers, language assessment providers, transcription services providers, call center services providers, and AI developers and labs) may use licensed Conversation Materials for their own purposes, which may include providing, maintaining, training, improving, and developing their own products and services, including their automated technologies, software, models, and algorithms.

- **Business Transfers:** We may disclose or transfer information in connection with, including during negotiations of, a proposed or actual merger, acquisition, reorganization, sale, financing, or similar transaction involving all or part of our business.
- **To Our Corporate Affiliates:** We may disclose information to our current or future corporate affiliates (including our subsidiaries) for commercial and operational purposes consistent with this Privacy Policy.
- **Protecting Rights, Safety, and Interests:** We may disclose information: to protect the safety, rights, property, or security of Conversifi, our affiliates, the Services, users of our Services, any other third party, or the general public; to detect, prevent, or otherwise address fraud, security, complaints, or technical issues; to prevent, investigate, or stop activity that Conversifi, in its sole discretion, may consider to be, or to pose a risk of being, an illegal, unethical, legally actionable, or inappropriate activity; to use as evidence in litigation; and to enforce this Privacy Policy and our Terms of Use.
- **Legal Compliance.** We may disclose information to comply with applicable legal or regulatory obligations, including as part of a judicial proceeding; in response to a subpoena, warrant, court order, or other legal process; or as part of an investigation or request from law enforcement or a government official.
- **Aggregate and/or De-Identified Information.** We may disclose aggregate and/or de-identified information for any purpose (including any or all of the purposes set forth above).

5. Your Choices

If you no longer want us to send you promotional communications: (i) you may unsubscribe from receiving our promotional emails (a) by following the unsubscribe link in such emails or (b) within your Conversifi Account; and (ii) you may unsubscribe from receiving our promotional text messages (a) by replying STOP to any such text messages or (b) within your Conversifi Account.

If you no longer want to allow us to use your personal data to train and develop our automated (including AI and other machine learning powered) technologies, software, models (including large language models), and algorithms, you may withdraw/revoke your consent within your Conversifi Account.

Please note that: (i) there may be a delay between your unsubscribe/withdrawal/revocation election and the processing of such election; and (ii) we are not responsible for third parties’ failure to comply with, or delay in complying with, such elections.

6. Jurisdiction-Specific Information and Consumer Rights

U.S. State General Privacy Laws

Consumer Rights

If you are an individual who is a resident of a U.S. state with an effective general privacy law that applies to us and some or all of the information we collect from you (each such law, a “**State Privacy Law**”), you have some or all of the following rights with respect to your Personal Data, as set forth in the applicable State Privacy Law:

- **Right to Know/Access.** You have the right to request that we disclose to you, following your verified/authenticated request:
 - The categories of Personal Data we have collected about you
 - The categories of sources from which the Personal Data is collected
 - The categories of third parties to which we disclose Personal Data
 - The specific pieces of Personal Data we have collected about you
- **Right to Delete.** You have the right to request that we delete, following your verified/authenticated request, the specific pieces of Personal Data we have collected about you.
- **Right to Correct.** You have the right to request that we correct, following your verified/authenticated request, any inaccurate Personal Data that we have collected about you.
- **Right to Data Portability.** You have the right to request that we provide you, following your verified/authenticated request, with a copy of the Personal Data about you that we process by automated means in a portable and, to the extent technically feasible, readily usable format that allows you to transmit it to another party.

We: (i) do not knowingly “sell” (as defined by applicable State Privacy Law) your Personal Data; (ii) do not use your Personal Data to engage in “targeted advertising” (as defined by the applicable State Privacy Law); (iii) do not use your Personal Data to engage in “profiling” (as defined by applicable State Privacy Laws) in furtherance of “decisions that produce legal or similarly significant effects concerning consumers” (as defined by applicable State Privacy Law) under any State Privacy Law that requires us to offer consumers the right to opt out of such Personal Data usage; (iv) do not process your sensitive Personal Data without your consent, unless permitted by applicable law, and (v) do not knowingly collect, use, or disclose your sensitive Personal Data for any purpose that would require us under any State Privacy Law to offer a right to limit the use and disclosure of such sensitive Personal Data. However, we may be considered to “sell” (as defined by applicable State Privacy Law) Third-Party Controller Personal Data to payment processing providers that control the collection of such Personal Data in connection with our use of their services. (For more information about such providers and our use of such services, please see (x) “Third-Party Payment Processing Providers, Financial Information, and Payment “Tokens”” in the “Data Collected through User Submissions” subsection of Section 2 (“Information We Collect”) above and (y) “Third-Party Controller Personal Data” in the “Data Collected through User Visits and Interactions” subsection of Section 2 (“Information We Collect”) above. For more information about such Personal Data, please see below in this subsection under “Disclosures of Personal Data”.)

- **Right of Non-Retaliation.** We may not retaliate against you because you exercise any of your rights under your applicable State Privacy Law.

Please note the following:

- The process we currently use to verify or authenticate “requests to know/access”, “requests to delete”, “requests to correct”, and “requests for data portability” requires you to provide your email address and certain information about your use of our Services.
- If you submit a “request to delete”, we may have a reasonable need to retain certain of your Personal Data. Therefore, if you submit a “request to delete”: (i) we will erase, de-identify, or aggregate the Personal Data that we do not reasonably need to retain; but (ii) we will not “delete” the Personal Data that we reasonably need to retain.

Please also note that certain U.S. state general privacy laws may not apply if you are acting in a commercial or employment context or as an employee, owner, director, officer or contractor of a company or other entity.

Methods of Submitting State Privacy Law Requests

If you are a resident of a U.S. state with a State Privacy Law, you may submit requests under that State Privacy Law to exercise your “right to know/access”, your “right to delete”, your “right to correct”, and/or your “right to data portability” by email to privacy@conversifi.com.

Please note that if we notify you that we were unable to verify/authenticate your “request to know/access”, “request to delete”, “request to correct”, or “request for data portability”, you may appeal our determination by emailing us at privacy@conversifi.com and indicating why you disagree with our determination (including by providing additional information to support your request).

Authorized Agents

If you are a resident of a U.S. state with a State Privacy Law, if and as required by that State Privacy Law, you may use an “authorized agent” to submit requests to exercise your “right to know”, your “right to delete”, your “right to correct”, and/or your “right to data portability” (as applicable) on your behalf under that State Privacy Law. Your authorized agent will need to provide us with a copy of a written permission that is signed by you and indicates that you have provided such authorization.

Categories of Personal Data

We collect (and during the last 12 months have collected) the following categories of Personal Data, from the following categories of sources, and for the following business or commercial purposes to the extent permitted by applicable law:

- *Category of Personal Data: **Identifiers*** (such as a real name, postal address, email address, an online identifier, or an internet protocol address)
 - *Categories of Sources:* We collect such information from users directly (such as when they register for our Services) and/or from third-party vendors (such as vendors that use cookies, pixels, and other similar online technologies on and/or in our Services and in third-party services (including in emails))
 - *Business/Commercial Purposes:* For our operational and commercial purposes, which may include: (i) providing our Services to and/or managing our relationships with users; (ii) performing under our arrangements with and/or managing our relationships with third parties (e.g., Third-Party Organizations); and (iii) sending communications (including promotional communications)
- *Category of Personal Data: **Characteristics of Protected Classifications under California or Federal Law*** (such as national origin and age)
 - *Categories of Sources:* We collect such information from users directly (such as when they register for our Services) and/or from third-party vendors, including vendors that perform analytics services for us
 - *Business/Commercial Purposes:* For our operational and commercial purposes, which may include: (i) providing our Services to and/or managing our relationships with users; and (ii) performing under our arrangements with and/or managing our relationships with third parties (e.g., Third-Party Organizations)
- *Category of Personal Data: **Commercial Information*** (such as records of Services used/purchased)

- *Categories of Sources:* We collect such information from users (based on the activities of those users in connection with our Services)
- *Business/Commercial Purposes:* For our operational and commercial purposes, which may include: (i) providing our Services to and/or managing our relationships with users; (ii) performing under our arrangements with and/or managing our relationships with third parties (e.g., Third-Party Organizations); and (iii) sending communications (including promotional communications)
- *Category of Personal Data: **Internet or Other Electronic Network Activity Information*** (such as information regarding interactions with our Services and our promotional communications and regarding how consumers arrived at our Site)
 - *Categories of Sources:* We receive such information from third-party vendors, including analytics companies that use cookies, pixels, and other similar online technologies on and/or in our Services and/or in third-party services (including in promotional emails)
 - *Business/Commercial Purposes:* For our operational and commercial purposes, which may include customizing and improving our Services and managing our relationships with users
- *Category of Personal Data: **Audio, Electronic, Visual, or Similar Information***
 - *Categories of Sources:* We receive such information from users directly, in particular (i) pursuant to their participation in a Conversation and (ii) if and when they otherwise provide it (e.g., a picture or a video) to us
 - *Business/Commercial Purposes:* For our operational and commercial purposes, which may include (i) providing our Services to and/or managing our relationships with users (including to train and develop our automated (including AI and other machine learning powered) technologies, software, models (including large language models), and algorithms and to generate/develop transcripts and other Conversation Materials); and (ii) performing under our arrangements with and/or managing our relationships with third parties (e.g., Third-Party Organizations)
- *Category of Personal Data: **Sensitive Personal Data*** (if and to the extent information (such as native language, country where a native language was learned, and/or the combination of a Conversifi login(s) and password(s)) that we collect is deemed “sensitive” Personal Data under a State Privacy Law
 - *Categories of Sources:* We collect such information when it is provided to us by users directly, in particular (i) in/as Account Data when they create or update their Conversifi Account, (ii) pursuant to their participation in a Conversation and/or if they voluntarily provide such information to us in a Conversation, and/or (iii) if they voluntarily provide such information in another communication to us or on our Site (such as an email or via customer support technology).
 - *Business/Commercial Purposes:* We process such sensitive Personal Data in connection with (a) the provision of our Services and (b) our de-identification of Personal Data. We do not expressly request any sensitive Personal Data other than as Account Data.

California

Do Not Track

Our Site does not support browser “Do Not Track” signals, and we do not change any of our data collection or use practices when we receive such signals. We will continue to evaluate potential responses to “Do Not Track” signals in light of industry developments or legal changes.

Your California Privacy Rights under the “Shine the Light” Law

California’s “Shine The Light” law permits certain individuals who are California residents to annually request and obtain information free of charge about what “personal information” (as defined by California’s “Shine the Light” law) is disclosed to third parties for direct marketing purposes in the preceding calendar year. We do not disclose your “personal information” to third parties for their direct marketing.

For more information, please email us at privacy@conversifi.com, with “California Shine the Light Privacy Request” in the subject line, and your full name, the email address you previously provided to Conversifi, and specific Conversifi Services you have used in the body of your email.

Use of Automated Technologies

We may use automated technologies, software, models, and algorithms to process Personal Data for our operational and commercial purposes, which may include: (i) to provide our Services, including (a) to provide our Conversation Services in the capacity of a “coach” (i.e., via our Conversation Services chatbot) and (b) to generate transcripts of Conversations; (ii) to assess the Conversation-related performance of “learners” and “coaches”; (iii) to train and develop our automated (including AI and other machine learning powered) technologies, software, models (including large language models), and algorithms; (iv) to de-identify Conversations and other Conversation Materials by removing or altering information that can reasonably be used to identify users; (v) to measure and analyze our Services (including to determine how best to enhance the usability and performance of our Services); (vi) to detect and prevent fraud and security breaches; (vii) to provide user and customer support; and (viii) otherwise to optimize and improve experiences of our users and customers and potential users and customers).

European Economic Area, Switzerland, United Kingdom, and Brazil

Legal Bases (GDPR and LGPD)

The EU General Data Protection Regulation (“**GDPR**”) requires a “legal basis” for processing “personal data” (as defined by GDPR) of European Economic Area (which includes, for purposes of this Privacy Policy, Switzerland and the United Kingdom) (“**EEA**”) data subjects, and the Brazilian General Data Protection Law (“**LGPD**”) requires a “legal basis” for processing “personal data” (as defined by LGPD) of Brazil data subjects. If you are an EEA or Brazil data subject, our legal basis for collecting, using, and disclosing the Personal Data described in this Privacy Policy will depend on the Personal Data we collect, the specific context in which we collect it, and the specific purposes for which we collect and use it, including as follows:

- *Purpose:* To provide Services to our users, and otherwise to perform our contracts with our users
 - *Legal Basis(es), if and to the extent applicable in the EEA or Brazil (with respect to Personal Data of EEA or Brazil data subjects, respectively):* To manage and perform our contracts (including our Terms of Use) with the applicable data subject, including via the provision of our Services to such data subject. In addition, we have a legitimate interest in managing our relationships with our users and potential users and in ensuring that we are effective and efficient as we can be and that we optimize the experience and satisfaction of our users and customers.
- *Purpose:* To respond to requests and questions, including about our Services
 - *Legal Basis(es), if and to the extent applicable in the EEA or Brazil (with respect to Personal Data of EEA or Brazil data subjects, respectively):* Such responses may be necessary to manage and perform our contracts (including our Terms of Use) with the applicable data

subject or to take steps at the request of the data subject prior to entering into a contract. In addition, we have a legitimate interest in managing our relationships with our users and customers and potential users and customers and in ensuring that we are effective and efficient as we can be and that we optimize the experience and satisfaction of our users and customers.

- *Purpose:* To provide user and customer support
 - *Legal Basis(es), if and to the extent applicable in the EEA or Brazil (with respect to Personal Data of EEA or Brazil data subjects, respectively):*
 - Such support may be necessary to manage and perform our contracts (including our Terms of Use) with the applicable data subject or to take steps at the request of the data subject prior to entering into a contract.
 - In addition, we have a legitimate interest in providing user and customer support, in managing our relationships with our users and customers and potential users and customers, and in optimizing the experience and satisfaction of our users and customers.
 - With your consent, if required by applicable law.
- *Purpose:* To maintain, administer, train, develop, measure, analyze, improve, and customize our Services, including to train and develop Conversifi's automated (including AI and other machine learning powered) technologies, software, models (including large language models), and algorithms
 - *Legal Basis(es), if and to the extent applicable in the EEA or Brazil (with respect to Personal Data of EEA or Brazil data subjects, respectively):*
 - We have a legitimate interest in maintaining, developing, and improving the quality, functionality, and efficiency of our Services and in optimizing the experience and satisfaction of our users and customers.
 - With your consent, if required by applicable law
- *Purpose:* The day-to-day running and management of our business and our Services
 - *Legal Basis(es), if and to the extent applicable in the EEA or Brazil (with respect to Personal Data of EEA or Brazil data subjects, respectively):*
 - We have a legitimate interest in managing our business and Services, including for operational, financial, employment, and administrative activities and decision-making purposes.
 - With your consent, if required by applicable law
- *Purpose:* For fraud prevention and detection and other security purposes

- *Legal Basis(es), if and to the extent applicable in the EEA or Brazil (with respect to Personal Data of EEA or Brazil data subjects, respectively):* We have a legitimate interest in preventing and detecting fraud and security breaches in connection with our Services.
- *Purpose:* In response to diligence investigation inquiries by third parties that are evaluating the prospect of acquiring all or part of our business, assets, or equity, or that succeed us in carrying on our business
 - *Legal Basis(es), if and to the extent applicable in the EEA or Brazil (with respect to Personal Data of EEA or Brazil data subjects, respectively):* We have a legitimate interest in managing our business, including for operational, financial, employment, and administrative purposes in connection with third-party diligence inquiries.
- *Purpose:* To enforce or defend our rights
 - *Legal Basis(es), if and to the extent applicable in the EEA or Brazil (with respect to Personal Data of EEA or Brazil data subjects, respectively):* To manage and perform our contracts (including our Terms of Use) and, if applicable, to comply with our legal or regulatory obligations
- *Purpose:* To investigate, manage, and resolve complaints and claims
 - *Legal Basis(es), if and to the extent applicable in the EEA or Brazil (with respect to Personal Data of EEA or Brazil data subjects, respectively):* To manage and perform our contracts (including our Terms of Use) and, if applicable, to comply with our legal or regulatory obligations
- *Purpose:* To investigate, manage, and resolve regulatory matters, investigations, and claims
 - *Legal Basis(es), if and to the extent applicable in the EEA or Brazil (with respect to Personal Data of EEA or Brazil data subjects, respectively):* To comply with our legal or regulatory obligations
- *Purpose:* To provide or make available data to police, law enforcement, tax authorities or other government agencies where we have a legal obligation and to comply with applicable laws, regulations or codes of practice
 - *Legal Basis(es), if and to the extent applicable in the EEA or Brazil (with respect to Personal Data of EEA or Brazil data subjects, respectively):* To comply with our legal or regulatory obligations
- *Purpose:* To de-identify Conversation Materials, including by removing or altering information (e.g., face and/or voice) that can otherwise reasonably be used to identify the data subject
 - *Legal Basis(es), if and to the extent applicable in the EEA or Brazil (with respect to Personal Data of EEA or Brazil data subjects, respectively):* respectively):
 - We have a legitimate interest in maintaining and improving the quality and efficiency of our Services and in enhancing the privacy of our users.
 - With your consent, if required by applicable law
- *Purpose:* To send promotional communications

- *Legal Basis(es), if and to the extent applicable in the EEA or Brazil (with respect to Personal Data of EEA or Brazil data subjects, respectively):* respectively): With your consent, if required by applicable law.
 - If you wish to stop receiving promotional communications from us, you can unsubscribe from such communications as described in Section 5 (“Your Choices”) above.

Special Categories of Personal Data/Sensitive Personal Data (GDPR and LGPD)

We may process “special categories” of Personal Data (or “sensitive” Personal Data) provided to us by users directly, in particular (i) in Account Data when they create or update their Conversifi Account, (ii) pursuant to their participation in a Conversation and/or if they voluntarily provide such information in a Conversation, and/or (iii) if they voluntarily provide such information in another communication to us or on our Site (such as an email or via customer support technology). We process such sensitive Personal Data in connection with (a) the provision of our Services and (b) our de-identification of Personal Data. We do not expressly request any sensitive Personal Data other than as Account Data.

Your Rights under GDPR

If you are an EEA data subject and certain requirements are fulfilled, you have the following data protection rights, as set forth in GDPR:

- **Right of Access.** You have the right to access your Personal Data.
- **Right to Erase.** You have the right to have us erase your Personal Data.
- **Right to Data Portability.** You have the right to be provided with a copy of your Personal Data in a structured, machine-readable and commonly used format (or have this transferred to a third party).
- **Right of Rectification.** You have the right to have your Personal Data rectified/updated if that information is inaccurate or incomplete.
- **Right to Object.** You have the right to object to our processing of your Personal Data carried out for purposes of our legitimate interests and/or for direct marketing.
- **Right of Restriction.** You have the right to request that we restrict the processing of your Personal Data.

If you wish to exercise one of the above-mentioned rights, please send us your request via email to privacy@conversifi.com. Please note that: (i) we may ask you to verify your identity before responding to such requests; and (ii) the process we currently use to comply with a verified exercise of the “right to data portability” is the same as the process we currently use to comply with a verified exercise of the “right of access”.

- **Right to Withdraw/Revoke Consent.** You also have the right to withdraw/revoke your consent at any time where we relied on your consent to process your Personal Data through the applicable mechanisms set forth in Section 5 (“Your Choices”) above. The withdrawal/revocation of consent shall not affect the lawfulness of processing based on consent before such withdrawal/revocation.

You also have the right to complain to a data protection authority about our collection and use of your personal data. We would, however, appreciate the opportunity to address your concerns before you approach a data protection authority, and would welcome you directing an inquiry first to us at privacy@conversifi.com.

GDPR and Third-Party Controller Personal Data

With respect to the EEA Personal Data we collect, Conversifi is the controller responsible for such Personal Data (without limiting the rights or obligations of any applicable third party with respect to Third-Party Controller Personal Data). As the controller, we determine the purposes for which and the manner in which such Personal Data are, or are to be, processed with respect to our Services. Third-party vendors that control the collection of Third-Party Controller Personal Data of EEA data subjects on and/or in our Services may also be considered “controllers” under GDPR and, therefore, responsible for enabling the rights of EEA data subjects under GDPR with respect to applicable Third-Party Controller Personal Data controlled by such third-party vendors. For more information about Third-Party Controller Personal Data, please see “Third-Party Controller Personal Data” in the “Data Collected through User Visits and Interactions” subsection of Section 2 (“Information We Collect”) above. For information about the contact details of each such third-party vendor and, if applicable, its GDPR representative and/or data protection officer, please see its privacy policy.

Your Rights under LGPD

If you are a Brazil data subject and certain requirements are fulfilled, you have the following data protection rights, as set forth in LGPD:

- **Right of Access.** You have the right to access your Personal Data.
- **Right of Deletion.** You have the right to have us delete your Personal Data.
- **Right to Data Portability.** You have the right to be provided with a copy of your Personal Data in a structured, machine-readable and commonly used format (or have this transferred to a third party).
- **Right of Confirmation.** You have the right to have us confirm the existence of our processing of your Personal Data.
- **Right of Correction.** You have the right to have your Personal Data corrected if that information is incomplete, inaccurate, or out-of-date.
- **Right to Deny Consent.** You have the right to deny consent to the processing of your Personal Data for which we rely on your consent as a legal basis, and to information about the consequences of such denial. For more information, please see Section 5 (“Your Choices”) above and the above “Legal Bases (GDPR and LGPD)” subsection of this section.
- **Right to Know about Data Sharing.** You have the right to know about the entities with which we have shared your Personal Data. For more information, please see Section 4 (“How We Disclose Information”) above.

If you wish to exercise one of the above-mentioned rights, please send us your request via email to privacy@conversifi.com. Please note that: (i) we may ask you to verify your identity before responding to such requests; and (ii) the process we currently use to comply with a verified exercise of the “right to data portability” is the same as the process we currently use to comply with a verified exercise of the “right of access”.

- **Right to Withdraw/Revoke Consent.** You also have the right to withdraw/revoke your consent at any time where we relied on your consent to process your Personal Data through the mechanisms set forth in Section 5 (“Your Choices”) above. The withdrawal/revocation of consent shall not affect the lawfulness of processing based on consent before such withdrawal/revocation.

LGPD and Third-Party Controller Personal Data

With respect to the Brazil Personal Data we collect, Conversifi is the controller responsible for such Personal Data (without limiting the rights or obligations of any applicable third party with respect to Third-Party Controller Personal Data). As the controller, we determine the purposes for which and the manner in which such Personal Data are, or are to be, processed with respect to our Services. Third-party vendors that control the collection of Third-Party Controller Personal Data of Brazil data subjects on and/or in our Services may also be considered “controllers” under LGPD and, therefore, responsible for enabling the rights of Brazil data subjects under LGPD with respect to applicable Third-Party Controller Personal Data controlled by such third-party vendors. For more information about Third-Party Controller Personal Data, please see “Third-Party Controller Personal Data” in the “Data Collected through User Visits and Interactions” subsection of Section 2 (“Information We Collect”) above.

7. Security

We strive to use reasonable and appropriate measures to protect the information (including Personal Data) we collect about you from loss, misuse, unauthorized access, disclosure, alteration, and destruction. However, no method of storage or transmission can guarantee 100% security.

Your information, including Personal Data, may be transferred to, and maintained on, computers, servers, and/or systems located outside of your state, province, country or other governmental jurisdiction, in jurisdictions where the data protection laws may differ from those in your jurisdiction. If you are located outside of the United States and provide information to us, please note that such information, including Personal Data, may be sent to, and processed in, the United States and/or other countries. By accessing and/or using our Services, **you consent to such transfers to and subsequent processing in such countries (including the United States), which your country may not consider to provide adequate privacy protections.**

8. Third-Party Links

There may be places on our Site where you may click on a link or logo to access another party’s website or application that does not operate under this Privacy Policy. Any access to and/or use of such linked websites or applications is not governed by this Privacy Policy but instead is governed by the privacy policies of those third-party websites or applications. You should review the privacy policy of every website and application you visit. We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party website, application, or service.

9. Children

Our Services are not targeted to children under thirteen (13) years of age, and we do not knowingly collect Personal Data through our Services from children under the age of thirteen (13). If you are a parent or guardian and you believe that your child has provided us with Personal Data without your consent, please contact us. (Please see Section 11 (“Contact Us”) below.) If we become aware that we have collected Personal Data from children without verification of parental consent, we will take steps to delete that Personal Data from our systems.

10. Changes to this Privacy Policy

This Privacy Policy is current as of the Effective Date set forth above. We may change this Privacy Policy from time to time. Each time you use any of our Services, the current version of this Privacy Policy will apply. Accordingly, when you use our Services, you should check the “Effective Date” at the top of the Privacy Policy and review any changes since the last version.

11. Contact Us

If you have questions or concerns about this Privacy Policy or our privacy practices in connection with our Services, please feel free to contact us by email to privacy@conversifi.com or by postal mail to the following

address: Conversifi, 5859 Braesheather Drive, Houston, TX 77096, USA. You may also contact our data protection representative by email to privacy@conversifi.com.