

PRIVACY POLICY

Last Updated: October 15, 2024

Temelio Inc. (“**Temelio**,” “**Company**,” “**we**,” “**us**,” or “**our**”) provides this privacy policy (this “**Privacy Policy**”) to our website visitors and customers to help you understand how we collect, use, process, and share your personal information, and to help you understand and exercise your privacy rights. This Privacy Policy is incorporated by reference into our terms of service (the “**Terms**”).

1. SCOPE AND UPDATES TO THIS PRIVACY POLICY

This Privacy Policy applies to personal information processed by us, including on our websites, mobile applications, and other online or offline offerings. To make this Privacy Policy easier to read, our websites, mobile applications, and other offerings are collectively called the “**Services**.”

WE MAY REVISE THIS PRIVACY POLICY FROM TIME TO TIME IN OUR SOLE DISCRETION. IF WE DO, WE WILL LET YOU KNOW BY APPROPRIATE MEANS SUCH AS BY POSTING THE REVISED PRIVACY POLICY ON THIS PAGE WITH A NEW “LAST UPDATED” DATE. IF THERE ARE ANY MATERIAL CHANGES TO THIS PRIVACY POLICY, WE WILL NOTIFY YOU AS REQUIRED BY APPLICABLE LAW. ALL CHANGES WILL BECOME EFFECTIVE WHEN POSTED UNLESS INDICATED OTHERWISE. WE ENCOURAGE YOU TO PERIODICALLY REVIEW THIS PAGE FOR THE LATEST INFORMATION ON OUR PRIVACY PRACTICES. IF YOU OBJECT TO ANY CHANGES, YOU MAY CLOSE YOUR ACCOUNT. YOU UNDERSTAND AND AGREE THAT YOU WILL BE DEEMED TO HAVE ACCEPTED THE UPDATED PRIVACY POLICY IF YOU CONTINUE TO USE OUR SERVICES AFTER THE NEW PRIVACY POLICY TAKES EFFECT.

2. PERSONAL INFORMATION WE COLLECT

The categories of personal information we collect depend on how you interact with us, our Services, and the requirements of applicable law. We collect information that you provide to us, information we obtain automatically when you use our Services, and information from other sources such as third-party services and organizations, as described below.

A. Personal Information You Provide to Us Directly

We may collect personal information that you provide to us.

- **Account Creation.** We may collect personal information when you create an account, including (without limitation) your name, email address, username and profile picture.
- **Purchases.** We may collect personal information and details associated with your purchases, including payment information. Any payments made via our Services are processed by third-party payment processors. We do not directly collect or store any payment card information entered through our Services, but we may receive information associated with your payment card information (e.g., your billing details).
- **Your Communications with Us.** We may collect personal information, such as email address, phone number, or mailing address when you request information about our Services, register for our newsletter or, request customer or technical support, or otherwise communicate with us.

- **Surveys.** We may contact you to participate in surveys. If you decide to participate, we may collect personal information from you in connection with the survey.
- **Interactive Features.** We and others who use our Services may collect personal information that you submit or make available through our interactive features (e.g., messaging and chat features, commenting functionalities, forums, blogs, and social media pages). Any information you provide using the public sharing features of the Services will be considered public information, unless otherwise required by applicable law, and is not subject to the privacy protections referenced herein. Please exercise caution before revealing any information that may identify you in the real world to other users.

B. Personal Information Collected Automatically

We may collect personal information automatically when you use our Services.

- **Automatic Collection of Personal Information.** We may collect certain information automatically when you use our Services, such as your Internet protocol (IP) address, user settings, MAC address, cookie identifiers, mobile carrier, mobile advertising and other unique identifiers, browser or device information, location information (including approximate location derived from IP address), and Internet service provider. We may also automatically collect information regarding your use of our Services, such as pages that you visit before, during and after using our Services, information about the links you click, the types of content you interact with, the frequency and duration of your activities, and other information about how you use our Services.
 - **Location Information.** We may collect precise location information, such as the geographic region from which you are accessing the Services, in connection with your use of our Services.
- **Cookie Policy (and Other Technologies).** We, as well as third parties that provide content, advertising, or other functionality on our Services, may use cookies, pixel tags, and other technologies (“**Technologies**”) to automatically collect information through your use of our Services.
 - **Cookies.** Cookies are small data files stored on your hard drive or in device memory that store preferences and facilitate and enhance your experience.
 - **Pixel Tags/Web Beacons.** A pixel tag (also known as a web beacon) is a piece of code embedded in our Services that collects information about engagement on our Services. The use of a pixel tag allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement. We may also include web beacons in e-mails to understand whether messages have been opened, acted on, or forwarded.

Our uses of these Technologies fall into the following general categories:

- **Operationally Necessary.** This includes Technologies that allow you access to our Services, applications, and tools that are required to identify irregular website behavior, prevent fraudulent activity, improve security, or allow you to make use of our functionality;
- **Performance-Related.** We may use Technologies to assess the performance of our Services, including as part of our analytic practices to help us understand how individuals use our Services (*see Analytics, below*);
- **Functionality-Related.** We may use Technologies that allow us to offer you enhanced functionality when accessing or using our Services. This may include identifying you when you sign into our Services or keeping track of your specified preferences, interests, or past items viewed.

See “Your Privacy Choices and Rights” below to understand your choices regarding these Technologies.

- **Analytics.** We may use Technologies and other third-party tools to process analytics information on our Services. These Technologies allow us to better understand how our digital Services are used and to continually improve and personalize our Services. Some of our analytics partners include:
 - **Google Analytics.** For more information about how Google uses your personal information (including for its own purposes, e.g., for profiling or linking it to other data), please visit Google Analytics’ Privacy Policy. To learn more about how to opt-out of Google Analytics’ use of your information, please click [here](#).
 - **FullStory.** For more information about how FullStory uses your personal information (including for its own purposes, e.g., for profiling or linking it to other data), please visit FullStory’s Privacy Policy. To learn more about how to opt-out of FullStory’s’ use of your information, please click [here](#).

C. Personal Information Collected from Third-Party Services and Sources

We may obtain personal information about you from other sources, including through third-party services and organizations. For example, if you access our Services through a third-party application, such as an app store, a third-party login service, or a social networking site, we may collect personal information about you from that third-party application that you have made available via your privacy settings.

3. HOW WE USE YOUR PERSONAL INFORMATION

We use your personal information for a variety of business purposes, including to provide our Services, for administrative purposes, and to market our products and Services, as described below.

A. Provide Our Services

We use your information to fulfill our contract with you and provide you with our Services, such as:

- Managing your information and accounts;
- Providing access to certain areas, functionalities, and features of our Services;
- Answering requests for customer or technical support;
- Communicating with you about your account, activities on our Services, and policy changes;
- Processing your financial information and other payment methods for products or Services purchased;

B. Administrative Purposes

We use your information for various administrative purposes, such as:

- Pursuing our legitimate interests such as network and information security and fraud prevention;
- Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity;
- Measuring interest and engagement in our Services;
- Improving, upgrading, or enhancing our Services;
- Developing new products and services;
- Ensuring internal quality control and safety;
- Authenticating and verifying individual identities, including requests to exercise your rights under this Privacy Policy;
- Debugging to identify and repair errors with our Services;
- Auditing relating to interactions, transactions, and other compliance activities;
- Sharing personal information with third parties as needed to provide the Services;
- Enforcing our agreements and policies; and
- Carrying out activities that are required to comply with our legal obligations.

C. With Your Consent

We may use personal information for other purposes that are clearly disclosed to you at the time you provide personal information with your consent.

D. Other Purposes

We also use your personal information for other purposes as requested by you or as permitted by applicable law.

- **De-identified and Aggregated Information.** We may use personal information to create de-identified and/or aggregated information, such as demographic information, information about the device from which you access our Services, or other analyses we create.

4. HOW WE DISCLOSE YOUR PERSONAL INFORMATION

We disclose your personal information to third parties for a variety of business purposes, including to provide our Services, to protect us or others, or in the event of a major business transaction such as a merger, sale, or asset transfer, as described below.

A. Disclosures to Provide our Services

The categories of third parties with whom we may share your personal information are described below.

- **Service Providers.** We may share your personal information with our third-party service providers and vendors that assist us with the provision of our Services. This includes service providers and vendors that provide us with IT support, hosting, payment processing, customer service, and related services.
- **Business Partners.** We may share your personal information with business partners to provide you with a product or service you have requested. We may also share your personal information with business partners with whom we jointly offer products or services.
- **Affiliates.** We may share your personal information with our company affiliates for example: for our administrative purposes, IT management, or for them to provide services to you or support and supplement the Services we provide.
- **APIs/SDKs.** We may use third-party application program interfaces (“**APIs**”) and software development kits (“**SDKs**”) as part of the functionality of our Services. For more information about our use of APIs and SDKs, please contact us as set forth in “Contact Us” below.

B. Disclosures to Protect Us or Others

We may access, preserve, and disclose any information we store associated with you to external parties if we, in good faith, believe doing so is required or appropriate to: comply with law enforcement or national security requests and legal process, such as a court order or subpoena; protect your, our, or others’ rights, property, or safety; enforce our policies or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.

C. Disclosure in the Event of Merger, Sale, or Other Asset Transfers

If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets, or transition of service to another provider, your information may be sold or transferred as part of such a transaction, as permitted by law and/or contract.

D. Generative AI Tools

The Services provided by the Company may incorporate the use of third-party Generative AI Tools (as defined below). The Company ensures that all Generative AI Tools are used in compliance with applicable license terms, consents, agreements, and laws. The Company may use sensitive PII, trade secrets, or confidential information, in either raw or de-identified and anonymized form, to train its Generative AI Tools, machine learning models or improve their services to the extent permitted by applicable laws. “Generative AI Tools” means generative artificial intelligence technology or similar tools capable of

automatically producing various types of content (such as source code, text, images, audio, and synthetic data) based on user-supplied prompts.

E. Hosted Databases

The personal information that the Company collects from you is stored in one or more databases hosted by third parties located in the United States and abroad. These third parties do not use or have access to your personal information for any purpose other than cloud storage and retrieval.

F. Disclosure with Your Consent

We may share personal information about you with third parties with your consent or at your discretion.

5. YOUR PRIVACY CHOICES AND RIGHTS

Your Privacy Choices. The privacy choices you may have about your personal information are determined by applicable law and are described below.

- **Email Communications.** If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. Note that you will continue to receive transaction-related emails regarding products or Services you have requested. We may also send you certain non-promotional communications regarding us and our Services, and you will not be able to opt out of those communications (e.g., communications regarding our Services or updates to our Terms or this Privacy Policy).
- **“Do Not Track.”** Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.

Your Privacy Rights. In accordance with applicable law, you may have the right to:

- **Access to and Portability of Your Personal Information,** including: (i) confirming whether we are processing your personal information; (ii) obtaining access to or a copy of your personal information; and (iii) receiving an electronic copy of personal information that you have provided to us, or asking us to send that information to another company in a structured, commonly used, and machine readable format (also known as the “right of data portability”);
- **Request Correction** of your personal information where it is inaccurate or incomplete. In some cases, we may provide self-service tools that enable you to update your personal information;
- **Request Deletion** of your personal information;
- **Request Restriction of or Object to** our processing of your personal information where the processing of your personal information is based on our legitimate interest or for direct marketing purposes; and
- **Withdraw your Consent** to our processing of your personal information. Please note that your withdrawal will only take effect for future processing and will not affect the lawfulness of processing before the withdrawal.

If you would like to exercise any of these rights, please contact us as set forth in “Contact Us” below. We will process such requests in accordance with applicable laws.

6. SECURITY OF YOUR INFORMATION

We take steps to ensure that your information is treated securely and in accordance with this Privacy Policy. Unfortunately, no system is 100% secure, and we cannot ensure or warrant the security of any information you provide to us. To the fullest extent permitted by applicable law, we do not accept liability for unauthorized access, use, disclosure, or loss of personal information.

By using our Services or providing personal information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of our Services. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on our Services, by mail, or by sending an email to you.

7. RETENTION OF PERSONAL INFORMATION

We store the personal information we collect as described in this Privacy Policy for as long as you use our Services, or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

8. SUPPLEMENTAL NOTICE FOR CALIFORNIA RESIDENTS

The information provided in this section applies only to California residents.

A. California Consumer Privacy Act of 2018. Companies that meet any of the following criteria are required by the California Consumer Privacy Act of 2018 (the "CCPA") to provide an explanation of the rights and choices that they offer California residents regarding the handling of such residents' personal information, along with information regarding the categories of personal information we collect, use and share:

- Companies that have a gross annual revenue of over \$25 million;
- Companies that buy, sell, or share the personal information of 100,000 or more California residents or households; or
- Companies that derive 50% or more of their annual revenue from selling California residents' personal information.

In the event that the Company meets any of the above criteria, the following rights under this Section XIII apply to California residents using the Services:

California residents' privacy rights:

The CCPA grants California residents the following rights:

- **Information:** You can request information about how we have collected, used and shared your personal information during the past twelve months.
- **Access:** You can request a copy of the personal information that we maintain about you.
- **Deletion:** You can ask us to delete the personal information that we have collected or maintain about you.

Please note that the CCPA limits these rights by, for example, prohibiting us from providing certain sensitive information in response to an access request and limiting the circumstances in which we must comply with a deletion request. If we deny your request, we will communicate our decision to you. You are entitled to exercise the rights described above free from discrimination.

How to submit a request:

To request access to or deletion of personal information from our databases, send an email to us at: privacy@trytemelio.com.

Identity Verification: CCPA requires us to verify the identity of the individual submitting a request for their personal information before providing a substantive response to the request. Because we take the privacy and security of your personal information seriously, we will verify your identity by asking you to provide certain information about yourself via email. Once your identity is verified, we will work to provide you with your requested information in a timely manner.

Authorized Agents: California residents can empower an “authorized agent” to submit requests on their behalf. To protect your privacy we will require the authorized agent to have a written authorization confirming that authority.

Personal information that we collect, use and share:

Information that we collect from you directly: Our Services may collect information directly from you, which identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly with a particular consumer or device (“Personal Information”). This Personal Information may be collected directly from you on our platform or through the Services, or indirectly from you, for example by observing your actions in the Services or on our platform.

Information that we collect from covered businesses: The Services also collect such Personal Information about you indirectly from third parties that may be a covered business under the CCPA. In such event the Company is deemed an exempt third party as defined in the CCPA, that processes Personal Information on behalf of such covered business for business purposes of electronic ordering, fulfillment, and delivery of academic credentials and data. Such processing activities are governed by the contract between the Company and such covered business and the privacy policy of such covered business. This privacy notice to California residents shall not apply to Personal Information collected from covered businesses. Please see the privacy policy and notices from such covered businesses.

As described above in this Privacy Policy, we do use cookies and other tracking tools on our website to analyze website traffic and facilitate advertising.

The CCPA requires that companies disclose their collection and use of specific categories of Personal Information enumerated in CCPA. Below is a table of those categories and a notification as to whether the Company collects each. Please note that, while each “CCPA category” may cover many types of personal information, the Company collects, uses and shares only the personal information described in this Privacy Policy.

CCPA Categories	Collected?
Identifiers	Yes
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	Yes
Protected classification characteristics under California or federal law	Yes
Commercial information	Yes
Biometric information	No
Internet or other similar network activity	Yes
Geolocation data	Yes
Sensory data	No
Professional or employment-related information	Yes
Non-public educational information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	No
Inferences drawn from other personal information	Yes

B. California Shine the Light. The California “Shine the Light” law permits users who are California residents to request and obtain from us once a year, free of charge, a list of the third parties to whom we have disclosed their personal information (if any) for their direct marketing purposes in the prior calendar year, as well as the type of personal information disclosed to those parties.

C. Right for minors to remove posted content. Where required by law, California residents under the age of 18 may request to have their posted content or information removed from the publicly-viewable portions of the Services by contacting us directly as set forth in Contact Us below.

9. SUPPLEMENTAL NOTICE FOR NEVADA RESIDENTS

The information provided in this section applies only to Nevada residents.

If you are a resident of Nevada, you have the right to opt-out of the sale of certain personal information to third parties who intend to license or sell that personal information. You can exercise this right by contacting us at privacy@trytemelio.com with the subject line “Nevada Do Not Sell Request” and providing us with your name and the email address associated with your account. Please note that we do not currently sell your personal information as sales are defined in Nevada Revised Statutes Chapter 603A. If you have any questions, please contact us as set forth in Contact Us below.

10. CHILDREN’S INFORMATION

The Services are not directed to children under the age of 18, and we do not knowingly collect personal information from children. If you are a parent or guardian and wish to review information collected from your child, or have that information modified or deleted, you may contact us as described in “Contact Us” below. If we become aware that a child has provided us with personal information in violation of applicable law, we will delete any personal information we have collected, unless we have a legal obligation to keep it.

11. OTHER PROVISIONS

Third-Party Websites/Applications. The Services may contain links to other websites/applications and other websites/applications may reference or link to our Services. These third-party services are not controlled by us. We encourage our users to read the privacy policies of each website and application with which they interact. We do not endorse, screen, or approve, and are not responsible for, the privacy practices or content of such other websites or applications. Providing personal information to third-party websites or applications is at your own risk.

Governing Law. By choosing to visit or utilize the Services or otherwise provide information to us, you agree that any dispute over privacy or the terms contained in this Privacy Policy will be governed by the laws of the State of New York and the adjudication of any disputes arising in connection with the Company or the Services will be in accordance with the Terms.

12. WHERE YOUR INFORMATION IS PROCESSED

Transferring Personal Data to the United States.

The Company is based in the United States. By using the Services, you acknowledge that your personal information may be processed in the United States. By accessing and using the Services and our platform, you consent that the Company may transfer, process, store, use and disclose your data and PII as described in this Privacy Policy.

The United States has not sought nor received a finding of “adequacy” from the European Union under Article 45 of the GDPR. Pursuant to Article 46 of the GDPR, the Company is providing for appropriate safeguards by entering binding, standard data protection clauses, enforceable by data subjects in the EEA and the UK. These clauses have been enhanced based on the guidance of the European Data Protection Board and will be updated when the new draft model clauses are approved.

Depending on the circumstance, the Company also collects and transfers to the U.S. personal data: (i) with consent; (ii) to perform a contract with you; or (iii) to fulfill a compelling legitimate interest of Temelio in a manner that does not outweigh your rights and freedoms. Temelio endeavors to apply suitable safeguards to protect the privacy and security of your personal data and to use it only as is consistent with your relationship with Temelio and the practices described in this Privacy Statement. Temelio also enters into data processing agreements and model clauses with its vendors whenever feasible and appropriate. Since it was founded, Temelio has received zero government requests for information.

Data Subject Rights.

The European Union’s General Data Protection Regulation (“**GDPR**”) and other countries’ privacy laws provide certain rights for data subjects. Data Subject rights under GDPR include the following:

- Right to be informed;
- Right of access;

- Right to rectification;
- Right to erasure;
- Right to restrict processing;
- Right of data portability;
- Right to object; and
- Rights related to automated decision making including profiling.

This Policy is intended to provide you with information about what personal data the Company collects about you and how it is used. If you wish to confirm that the Company is processing your personal data, or to have access to the personal data that the Company may have about you, please contact us.

You may also request information about: (i) the purpose of the processing; (ii) the categories of personal data concerned; (iii) who else outside of the Company might have received the data from the Company; (iv) what the source of the information was (if you didn't provide it directly to the Company); and (v) how long it will be stored. You have a right to correct (rectify) the record of your personal data maintained by the Company if it is inaccurate. You may request that the Company erase that data or cease processing it, subject to certain exceptions. You may also request that the Company cease using your data for direct marketing purposes. In many countries, you have a right to lodge a complaint with the appropriate data protection authority if you have concerns about how the Company processes your personal data. When technically feasible, the Company will—at your request—provide your personal data to you.

Reasonable access to your personal data will be provided at no cost. If access cannot be provided within a reasonable time frame, the Company will provide you with a date when the information will be provided. If for some reason access is denied, the Company will provide an explanation as to why access has been denied.

For questions or complaints concerning the processing of your personal data, you can email us at privacy@trytemelio.com. Alternatively, if you are located in the European Union, you can also have recourse to the European Data Protection Supervisor or with your nation's data protection authority.

13. CONTACT US

The Company is the controller of the personal information we process under this Privacy Policy.

If you have any questions about our privacy practices or this Privacy Policy, or to exercise your rights as detailed in this Privacy Policy, please contact us via email at privacy@trytemelio.com, or by phone at 530-574-8406