

Privacy Policy

Effective as of July 18, 2020.

This Privacy Policy describes how Beacons AI, Inc. and our subsidiaries and affiliates (collectively "**Beacons**," "**we**", "**us**" or "**our**") handle personal information that we collect through our digital properties that link to this Privacy Policy, including our website and applications integrated on other websites such as www.shopify.com (collectively, the "**Service**"), as well as through social media, our marketing activities, and other activities described in this Privacy Policy.

[Click here for a printable copy of this Privacy Policy.](#)

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About Beacons

Beacons connects content creators with their audiences. We help content creators make websites that curate their content from different platforms for their audiences, sell digital goods, allow audiences to submit Requests to them and support them, and facilitate partnerships with merchants to sell products. Merchants can work with content creators through the Beacons platform, such as by using the Beacons Social Selling application in the Shopify app store or joining other affiliate marketplaces.

Personal information we collect

Information you provide to us. Personal information you may provide to us through the Service or otherwise includes:

- **Contact data**, such as your first and last name, email address, mailing address, and phone number.

- **Profile data**, such as your username and password that you set to establish an online account with us, social network handles, biographical details, photographs (we use a content creator's public Instagram photo as their default profile photo), links and descriptions that you add to your profile, interests, preferences, and any other information that you add to your account profile.
- **Communications** that we exchange, including when you contact us with questions or feedback, through social media, or otherwise, and that you exchange with others on or through the Service.
- **Payments and transactional data** needed to complete your orders, Requests, Support, or payments on or through the Service (such as payment card information, billing and shipping information, payment processor information).
- **Marketing data**, such as your preferences for receiving communications about our or our partners' products, services, activities, and events, and details about how you engage with our communications.
- **Content** that you upload or share to the Service, including text, photos, and videos in connection with Requests, products, digital goods and your profile.
- **Product data**, such as the description of a product or digital good for sale, its price, and its commission.
- **Other information** that we may collect which is not specifically listed here, which we will use as described in this Privacy Policy or as otherwise described at the time of collection.

Third party sources. We may combine personal information we receive from you with personal information we obtain from other sources, such as:

- **Public sources**, such as social media platforms.
- **Business partners**, such as companies that have entered into joint marketing relationships or other joint ventures with us, merchants, and affiliate marketplaces.

Automatic data collection. We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, your activity over time on our sites and other online services, and your interactions with our marketing communications such as:

- **Device data**, such as your computer's or mobile device's operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers (including identifiers used for advertising purposes), language settings, mobile device carrier, radio/network information (e.g., WiFi, LTE, 3G), and general location information such as city, state or geographic area.
- **Online activity data**, such as pages or screens you viewed, how long you spent on a page or screen, the website you visited before browsing to the Service, navigation paths between pages or screens, information about your activity on a page or screen, access times, and duration of access, and whether you have opened our marketing emails or clicked links within them.

Cookies. Some of our automatic data collection is facilitated by cookies and similar technologies. For more information, see our Cookie Notice.

Data about others. Users of the Service may have the opportunity to refer friends or other contacts to us and share their contact information with us. Please do not refer someone to us or share their contact information with us unless you have their permission to do so.

How we use your personal information

We use your personal information for the following purposes or as otherwise described at the time we collect it:

Service delivery. We use your personal information to:

- provide, operate and improve the Service and our business;
- process and track your orders;
- facilitate payments;
- establish and maintain your user profile on the Service;
- enable security features of the Service, such as by sending you security codes via email, and remembering devices from which you have previously logged in;
- communicate with you about the Service, including by sending announcements, updates, security alerts, and support and administrative messages;
- understand your needs and interests, and personalize your experience with the Service and our communications; and
- provide support for the Service, and respond to your requests, questions and feedback.

Research and development. We may use your personal information for research and development purposes, including to analyze and improve the Service and our business. As part of these activities, we may create aggregated, de-identified or other anonymous data from personal information we collect. We make personal information into anonymous data by removing information that makes the data personally identifiable to you. We may use this anonymous data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business.

Marketing. We may send you Beacons-related or other direct marketing communications as permitted by law. You may opt-out of our marketing communications as described in the [Opt-out of marketing](#) section below.

Compliance and protection. We may use your personal information to:

- comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities;
- protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- audit our internal processes for compliance with legal and contractual requirements and internal policies;
- enforce the terms and conditions that govern the Service; and
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

How we share your personal information

We may share your personal information with the following parties and as otherwise described in this Privacy Policy or at the time of collection:

Affiliates. Our corporate parent, subsidiaries, and affiliates, for purposes consistent with this Privacy Policy.

Service providers. Companies and individuals that provide services on our behalf or help us operate the Service or our business (such as information technology, hosting, customer relationship management and support, payment processing, email delivery, advertising, marketing, and website analytics).

Professional advisors. Professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.

Authorities and others. Law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for the [compliance and protection purposes](#) described above.

Business transferees. Acquiring and other relevant parties to business transactions (or potential transactions) involving a corporate divestiture, merger, consolidation, acquisition, reorganization, sale or other disposition of all or any portion of the business or assets of, or equity interests in, Beacons or our affiliates (including, in connection with a bankruptcy or similar proceedings).

Merchant partners. We may share your personal information with our merchant partners and affiliate marketplaces or enable them to collect information directly via our Service. For example, we work with Shopify.com merchants to display products for purchase on the Service; if you add a merchant's product to your Beacons website or purchase a product, personal information will be shared with the merchant and/or Shopify. You may view Shopify's Privacy Policy [here](#).

Other users and the public. You may choose to make publicly visible some of the information on your profile. If you submit a Request to a content creator, you can choose to make the Request public or private. Any information that is not private may be associated with your profile and can be collected and used by others. We cannot control who reads the information that you make viewable or what they may choose to do with it.

Your choices

You have the following choices with respect to your personal information.

Access or update your information. If you have registered for an online account with us, you may review and update certain account information from your account.

Opt-out of marketing communications. You may opt-out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email, or by [contacting us](#). You may continue to receive service-related and other non-marketing emails.

Cookies. For information about cookies employed by the Service and how to control them, see our Cookie Notice.

Do Not Track. Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not respond to "Do Not Track" or similar signals. To find out more about "Do Not Track," please visit <http://www.allaboutdnt.com>.

Declining to provide information. We need to collect personal information to provide certain services. If you do not provide the information we identify as mandatory, we may not be able to provide those services.

Third party platforms. If you choose to connect to the Service through your social media account, you may be able to use your settings in your account with that platform to limit the information we receive from it. If you revoke our ability to access information from a third party platform, that choice will not apply to information that we have already received from that third party.

Privacy settings. In your account’s privacy settings, you may choose to make certain profile information publicly visible and whether you want third parties to be able to find or contact you through the Service.

Other sites and services

The Service may contain links to websites, mobile applications, and other online services operated by third parties. These links are not an endorsement of, or representation that we are affiliated with, any third party. In addition, our content may be included on web pages or in mobile applications or other online services that are not associated with us. We do not control websites, mobile applications or online services operated by third parties, and we are not responsible for their actions.

Security

We employ a number of technical, organizational and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies and we cannot guarantee the security of your personal information.

International data transfer

We are headquartered in the United States and may use service providers that operate in other countries. Your personal information may be transferred to the United States or other locations where privacy laws may not be as protective as those in your state, province, or country.

Children

The Service is not intended for use by children under 16 years of age. If we learn that we have collected personal information through the Service from a child under 16 without the consent of the child’s parent or guardian as required by law, we will delete it.

Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Service. If required by law we will also provide notification of changes in another way that we believe is reasonably likely to reach you, such as via email or another manner through the Service. Any modifications to this Privacy Policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). In all cases, your use of the Service after the effective date of any modified Privacy Policy indicates your acceptance of the modified Privacy Policy.

How to contact us

- **Email:** privacy@beacons.ai
- **Mail:** Beacons AI, Inc., 625 8th St, Unit 406, San Francisco, CA 94103
- **Phone:** 415-843-2267

Information for California residents

Scope. This section describes how we collect, use, and share the Personal Information of California residents as a “business” under the California Consumer Privacy Act (“**CCPA**”) and their rights with respect to their Personal Information. For purposes of this section, “**Personal Information**” has the

meaning given in the CCPA but does not include information exempted from the scope of the CCPA. This section only applies to consumers—individuals who seek to use products and services for their personal or household use. This section does not apply to information we collect from you in the course of communicating with you in your capacity as an employee, controlling owner, director, officer or contractor of an organization (i.e., company, partnership, sole proprietorship, non-profit or government agency) in the context of performing due diligence on, or providing or receiving products or services to or from, that organization.

Your California privacy rights. As a California resident, you have the rights listed below. However, these rights are not absolute, and in certain cases we may decline your request as permitted by law.

- **Information.** You can request the following information about how we have collected and used your Personal Information during the past 12 months:
 - The categories of Personal Information we have collected.
 - The categories of sources from which we collected the Personal Information.
 - The business or commercial purpose for collecting and/or selling Personal Information.
 - The categories of third parties with whom we share the Personal Information.
 - The categories of Personal Information that we sold or disclosed for a business purpose.
 - The categories of third parties to whom the Personal Information was sold or disclosed for a business purpose.
- **Access.** You can request a copy of the Personal Information that we have collected about you during the past 12 months.
- **Deletion.** You can ask us to delete the Personal Information that we have collected from you.
- **Nondiscrimination.** You are entitled to exercise the rights described above free from discrimination as prohibited by the CCPA.

We do not “sell” your personal information as defined in the CCPA.

How to exercise your rights

You may submit requests to exercise your California privacy rights described above as follows:

- **Right to information, access and deletion.** You may submit requests to exercise your right to information, access or deletion by:
 - visiting <https://privacy.beacons.ai/ccpa>
 - emailing privacy@beacons.ai

We cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it.

We will need to verify your identity to process your information, access and deletion requests and reserve the right to confirm your California residency. To verify your identity, we may require you to log into your Beacons account (if applicable), provide government identification, give a declaration as to your identity under penalty of perjury and/or provide additional information. Your authorized agent may make a request on your behalf upon our verification of the agent’s identity and our receipt of a copy of a valid power of attorney given to your authorized agent pursuant to California Probate Code Sections 4000-4465. If you have not provided your agent with such a power of attorney, you must provide your agent with signed permission to exercise your CCPA rights on your behalf, provide the information we request to verify your identity, and provide us with written confirmation that you have given the authorized agent permission to submit the request. Authorized agents are required by

California law to implement and maintain reasonable security procedures and practices to protect their clients' information.

Personal information that we collect, use and disclose

The chart below describes the Personal Information we collected and disclosed during the 12 months preceding the effective date of this Privacy Policy by reference to the categories of Personal Information specified in the CCPA (California Civil Code § 1798.140). Information you voluntarily provide to us, such as in free-form webforms, may contain other categories of personal information not described below.

Statutory category of Personal Information (Cal. Civ. Code § 1798.140)	Personal Information we collect in this category (See the "Personal information we collect" section above for description)
Identifiers	<ul style="list-style-type: none"> • <i>Contact data</i>
California Customer Records (as defined in California Civil Code section 1798.80)	<ul style="list-style-type: none"> • <i>Contact data</i> • <i>Payment & transactional data</i> • <i>Communications</i> • <i>Marketing data</i> • <i>Content</i>
Commercial Information	<ul style="list-style-type: none"> • <i>Profile data</i> • <i>Payment & transactional data</i> • <i>Communications</i> • <i>Marketing data</i> • <i>Content</i> • <i>Online activity data</i>
Financial Information	<ul style="list-style-type: none"> • <i>Payment & transactional data</i>
Online Identifiers	<ul style="list-style-type: none"> • <i>Profile data</i> • <i>Device data</i>
Internet or Network Information	<ul style="list-style-type: none"> • <i>Marketing data</i> • <i>Device data</i> • <i>Online activity data</i>
Geolocation Data	<ul style="list-style-type: none"> • <i>Device data</i>
Inferences	<p><i>May be derived from your:</i></p> <ul style="list-style-type: none"> • <i>Payment & transactional data</i> • <i>Marketing data</i> • <i>Content</i> • <i>Device data</i> • <i>Online activity data</i>
Protected Classification Characteristics	<ul style="list-style-type: none"> • <i>Profile data (if characteristics disclosed)</i> • <i>Content (if characteristics disclosed)</i>
Sensory Information	<ul style="list-style-type: none"> • <i>Profile data</i> • <i>Content</i>
Sources. We describe the sources from which we collect this Personal Information in the section above entitled <u>Personal information we collect</u> .	

Purposes. We describe the business and commercial purposes for which we collect this Personal Information in the section above entitled How we use your personal information.

Disclosure. We disclosed this Personal Information to the categories of third parties described in the section above entitled How we share your personal information.