

Copado AI Privacy Policy

Effective Date: September 4th, 2023

Quick Summary

At Copado Holdings, Inc. (together with our affiliates), we greatly value and respect the privacy of our community. This Privacy Policy applies to the use of Copado's AI applications, software, products, and services (the "Services") and explains our practices regarding the collection, use, and disclosure of your data within the Services.

1. Purpose and Scope.

Contracts held directly between our Customers, Partners, or Service Providers govern over the terms of this Policy. This Privacy Policy is designed to give you more information about Copado's AI Services and related activities. Copado's Services may collect your data for the following purposes:

- Providing our Services to you as a Copado user;
- Enabling transfers of data to our service providers, including Google and OpenAI;
- To improve our Services and conduct research;
- To protect the security of our systems, infrastructure, and community;
- To meet our contractual obligations; and
- To comply with legal obligations.

2. Categories of Personal Data and Information that we Collect.

We may collect, store, and use data through your access to and use of the Services:

- Copado's core services will collect minimal account registration information such as name, email address, and username or user ID.
- User content entered into the Services will be collected as part of our delivery of the Services.
- Usage information including certain automated information about our users, such as unique browser identifiers, IP address, browser and operating system information, device identifiers (such as the Apple IDFA or Android Advertising ID), and other device information.
- Contact information derived from your interactions with us, such as with our customer support team, provided that these interactions will occur outside of the Services and would be governed by Copado's Privacy Policy found [here](#).

3. How we Use and Share Data.

Copado uses and shares data for the following purposes:

- To provide our Services;
- To analyze, improve, and develop Services.
- To interact with third party service providers;
- For security, IT management, and related research.
- To enforce the legal terms that govern our business and commercial relationships.
- To follow the law, or in other cases where we believe that using or disclosing the data is appropriate to protect the rights, safety, and property of Copado or others (for example, when required to make disclosures in response to lawful requests by public authorities, such as to meet national security or law enforcement requirements).
- For an actual or contemplated business sale, merger, consolidation, change in control, transfer of substantial assets, or reorganization, or due diligence in anticipation of such an event (for example, if a company were to acquire Copado, it may also acquire the personal data we hold).
- For other purposes requested or permitted by our customers or users.

For those purposes, we may share data with the following:

- Our affiliated entities;
- Third parties that assist us, such as our providers of technical services (e.g., cloud computing providers, providers of data storage, data backup, and CRM systems);
- Entities involved in any regulatory inquiry or dispute resolution (such as an arbitrator or an opposing party); and/or
- Entities involved in potential or actual significant corporate transactions or events (such as those described in the second-to-last item in the list of uses and disclosures above).

These uses and disclosures are also subject to our contractual obligations. Copado does not sell or share personal data for monetary or other consideration, nor does Copado share data for cross-context behavioral advertising.

The Services currently shares data with and uses the OpenAI platform via OpenAI's API. As of the effective date of this Privacy Policy, OpenAI's policies state that it will not use data submitted by customers via its API to train or improve its models. Similarly, OpenAI's policies state that data sent through the API will be retained for abuse and misuse monitoring purposes for a maximum of 30 days, after which it will be deleted (unless otherwise required by law). Please review the API Data Usage Policy (<https://openai.com/policies/api-data-usage-policies>) and privacy policy provided by OpenAI Platform (<https://openai.com/policies/privacy-policy>).

4. Does the data Go to Other Countries?

Copado is a global company. During implementation of other Copado services and therefore the use of the Services, customers may select a geographic location for Copado's backend data processing facility. If no location is selected then it will default to Copado's US-based backend. It is Copado's policy to comply with applicable law, which may include legal requirements for protecting the movement of data across borders. Copado affiliates and third parties with whom we share personal data as described in this Privacy Policy are located in the United States and elsewhere in the world, including countries where privacy laws may not provide as much protection as your country.

5. Use of Automated Tracking Technology.

When accessing the Services, Copado and third-party partners of Copado may collect certain information by automated means. This information may include unique browser identifiers, IP address, browser and operating system information, device identifiers (such as the Apple IDFA or Android Advertising ID), rough geolocation, other device information, Internet connection information, as well as details about your interactions with our apps, websites, and emails (for example, the URL of the third-party website from which you came, the pages on our website that you visit, and the links you click on in our websites).

- Perform analytics, measure traffic and usage trends, and better understand the demographics of our users.
- Diagnose and fix technology problems.
- Plan for and enhance our business.

Please visit your mobile device manufacturer's website (or the website for its operating system) for instructions on any additional privacy controls in your mobile operating system. Please note, however, that we do not respond to browser-based privacy signals (such as do-not-track) at this time.

6. How Long does Copado Store Your Data?

We will retain data as long as necessary to fulfill the purposes outlined in this Privacy Policy unless the law requires us to keep it for a longer period of time. To provide security and business continuity for the activities described in this Policy, we may make backups of certain data, which we may retain for longer than the original data.

7. How do we Provide sSecurity for Data that we Handle and Store?

Copado takes the security of data seriously and although we cannot guarantee that data that we collect can be protected from all possible threats, Copado has put in place physical, technical, and administrative safeguards designed to protect your personal data from unauthorized or illegal access, destruction, use, modification, or disclosure in accordance with applicable laws. Copado employees also undergo privacy and security training upon hire and annually thereafter.

8. Other Websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over other websites. Therefore, we cannot be responsible for the protection of any information provided while visiting such websites, and such websites are not governed by this Privacy Policy. You should exercise caution and carefully review the privacy policy applicable to the website in question.

9. Children's Privacy

We do not knowingly collect personal data from children under the age of 18. By accessing our website or initiating any communication with us, you represent that you are at least 18 years old. Copado's Services are not directed to children under the age of 18. If you believe a child under the age of 18 is using our Services, please promptly contact us at legal@copado.com.

10. Your Rights

Depending on your location, you may have certain rights under law as it relates to the information collected.

10.1 Categories of Personal Information Collected.

The Services governed by this Privacy Policy are not intended for the collection or use of personal information or sensitive information. Additionally, Copado contractually restricts the use of "Restricted Information" from being used within any of Copado's products and services. Restricted Information means: (a) government issued identification numbers, (b) personal credit card numbers, (c) medical records or health care information; (d) information regulated under the International Traffic in Arms Regulations, (e) technical data restricted under applicable export law, and/or (f) any other personal data without ensuring sufficient legal basis. Having said that, we are unable to control what information is entered into the Services. We identify below the categories of personal information that we have collected about our users in the last 12 months:

- Information entered into prompts;
- Identifiers;
- Internet or Other Electronic Network Activity Information.

10.2 Categories of Personal Information Shared.

The Services are not intended for the collection or use of most personal information. Copado contractually restricts the use of "Restricted Information" from being used within any of Copado's products and services. Restricted Information means: (a) government issued identification numbers, (b) personal credit card numbers, (c) medical records or health care information; (d) information regulated under the International Traffic in Arms Regulations, (e) technical data restricted under applicable export law, and/or (f) any other personal data without ensuring sufficient legal basis. Having said that, we are unable to control what information is entered into the Services. We identify below the categories of personal information that we have provided to our service providers for limited business purposes in the last 12 months:

- Information entered into prompts;
- Identifiers;
- Internet or Other Electronic Network Activity Information.

Copado does not sell personal information to any third-party for monetary consideration, or share personal information with third parties for cross-context behavior advertising, and has not sold Personal Information of any kind in the past 12 months.

Copado shares the above-referenced data with its trusted third-party service providers, and we instruct such third parties to use the data provided in a way that is consistent with this Privacy Policy and applicable laws and regulations.

10.3 Legal Basis for Processing

While the Services are not intended for the collection and use of most types of personal data, we recognize that certain categories of personal information may be collected or input into the Services. Where applicable data privacy laws apply, our legal grounds for processing personal data include:

- Legitimate business interests: We handle personal data because it furthers the legitimate business interests of Copado (or of our customers, business partners, or suppliers) in the activities we engage in to run our business and provide you with Services, including those listed below, and because that handling of data does not unduly impact your interests, rights, and freedoms:
 - Providing cybersecurity and managing information technology assets;
 - Protecting business activities, individuals, and property;
 - Providing customer service;
 - Analyzing and improving business activities;
 - Managing risks and legal issues.
- To perform contractual commitments: Some of our handling of personal data is necessary to meet our contractual obligations to individuals, or to take steps at the person's request because we are planning to enter into a contract with him/her. For example, when we process an individual's payment data for a certification examination, we are relying on this basis.
- Consent:
 - If the law requires consent, and in some other cases, we handle personal data on the basis of consent. For example, we conduct some of our direct marketing on the basis of consent.
 - If the law requires explicit consent, we use personal data on that basis.
 - If the law allows, we may be able to infer consent from the circumstances.
- Legal compliance: We sometimes need to use and disclose personal data to comply with our legal obligations.
- Legal claims: Sometimes we use or disclose personal data because it is necessary to establish, exercise, or defend legal claims.

10.4 Rights of Data Subjects.

While the Services are not intended for the collection and use of most types of personal data, we recognize that certain categories of personal information may be collected or input into the Services. Certain Residents of California, Virginia, the European Union, and certain other jurisdictions may be entitled to the following rights under the applicable law. To exercise any of the rights, please submit a request to privacy@copado.com or call our toll-free number (at the end of this Privacy Policy). In the request, please specify which right you are seeking to exercise and the scope of the request. We will confirm receipt of your request within the legally permissible time period. If we decline to take action, we will notify you of our justification for denial, and we will provide you with instructions for how to appeal our denial. We may require specific information from you to help us verify your identity and process your request. If we are unable to verify your identity or process your request for legal or archival reasons, we may deny your requests and will inform you of our reason for doing so.

- A. Right to Know:** You have the right to know certain details about our data practices in the past 12 months. In particular, you may request the following from us:
- a. The categories of personal information we have collected about you;
 - b. The categories of sources from which the personal information was collected;

- c. The categories of personal information about you we disclosed for a business purpose or sold;
 - d. The categories of third parties to whom the personal information was disclosed for a business purpose or sold;
 - e. The business or commercial purpose for collecting or selling the personal information;
- B. Right to Access.** You have the right to review or obtain a copy of the specific categories of personal information we have collected about you in a portable and usable format;
- C. Right to Delete.** You have the right to request that we delete the personal information we have collected from you. We may require specific information from you to help us verify your identity and process your request. If we are unable to verify your identity, we may deny your request to delete. Please note that your right to deletion of Personal Information is subject to certain exceptions by law. If you submit a request for deletion and we retain any Personal Information under one or more of these exceptions, we will explain this to you in our response;
- D. Right to Correct.** You have the right to request that we correct inaccurate personal information that we attribute to you;
- E. Right to Non-discrimination.** You have the right not to receive discriminatory treatment by us for exercising any of your rights;
- F. Right to Opt Out.** You have the right to opt out of the sharing and processing of personal data for certain purposes, including targeted advertising, the sale of personal data, and profiling for decisions with legal or other significant effects on you, in addition to the other opt out rights afforded to you under the applicable laws and regulations; and/or
- G. Authorized Agent.** You can designate an authorized agent to submit requests on your behalf. However, we will require written proof of the agent's permission to do so or written confirmation from your email confirming the request.
- H. Data Protection Assessment.** Copado conducts an annual risk assessment and independent security audits designed to review processes and controls around the protection of your personal data. Copado takes these assessments seriously, and we use the assessments to make informed decisions about our collection and use of your data. If a customer requires Copado's assistance with a data protection assessment as it relates to the purchase and use of the Services, please contact security@copado.com.

11. Changes to the Privacy Policy.

In the event of changes in the law, our data handling practices or for other reasons, Copado reserves the right to update and change this Policy at any time, by updating and publishing the revised Privacy Policy on Copado.com.

12. How to Contact Us.

If you have any questions or wish to exercise your rights under applicable privacy laws, you may send notice by email to Copado at privacy@Copado.com or if you are in the United States you may call our toll free telephone number: 1-(888) 210-4282. You may also send a written notice to us at one of the following addresses:

United States:
Copado, Inc.
Attn: Legal Dept.
330 N. Wabash St. Fl. 23, Chicago IL 60611
United States

European Union:
Copado Netherlands B.V.
Attn: Legal Dept.
Barbara Strozzi laan 201, 1083 HN Amsterdam
The Netherlands