Privacy Policy

We take your privacy very seriously.

Last Updated: 29 December 2024

Please read this Privacy Policy to learn how we treat your personal data. This Privacy Policy applies to all users of the Markit Platform, which includes our mobile application and web-based application (the “Platform”). By using or accessing our Services in any manner, you acknowledge that you accept the practices and policies outlined below, and you hereby consent that we will collect, use and share your information as described in this Privacy Policy.

Remember that your use of Markit's Services is at all times subject to our Terms of Use which incorporates this Privacy Policy. Any terms we use in this Policy without defining them have the definitions given to them in the Terms of Use.

You may print a copy of this Privacy Policy by clicking here.

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What this Privacy Policy Covers

This Privacy Policy covers how we treat Personal Data that we gather when you access or use our Services. “Personal Data” means any information that identifies or relates to a particular individual and

also includes information referred to as “personally identifiable information” or “personal information”under applicable data privacy laws, rules or regulations. This Privacy Policy does not cover the practices of companies we don’t own or control or people we don’t manage.

Personal Data

Categories of Personal Data We Collect
This chart details the categories of Personal Data that we collect and have collected over the past 12 months:

Category of Personal Data	Examples of Personal Data We Collect	Categories of Third Parties With Whom We Share this Personal Data:
Profile or Contact Data	• First and last name • Email • Phone number • Unique identifiers such as passwords	• Service Providers • Analytics Partners • Business Partners • Parties You Authorize, Access or Authenticate
Identifiers	• Cultural or social identifiers (for example, being a skateboarder, a Green Bay Packers fan, an environmental activist, etc.)	• Service Providers • Analytics Partners • Parties You Authorize, Access or Authenticate
Payment Data	• Payment card type • Payment card number • Bank account information • Billing address, phone number, and email	• Service Providers (specifically our payment processing partner, currently Stripe, Inc.)
Commercial Data	• Purchase history • Consumer profiles	• Service Providers • Analytics Partners • Parties You Authorize, Access or Authenticate
Device/IP Data	• IP address • Device ID • Domain server • Type of device/operating system/browser used to access the Services	• Service Providers • Analytics Partners • Parties You Authorize, Access or Authenticate
Web Analytics	• Web page interactions • Referring webpage/source through which you accessed the Services • Statistics associated with the interaction between device or browser and the Services	• Analytics Partners • Parties You Authorize, Access or Authenticate
Social Network Data	• User name on the social network • Info from your social media profile	• Parties You Authorize, Access or Authenticate
Geolocation Data	• IP-address-based location information • GPS data	• Analytics Partners • Parties You Authorize, Access or Authenticate
Sensory Data	• Photos, videos or recordings of your environment	• Service Providers • Parties You Authorize, Access or Authenticate
Inferences Drawn From Other Personal Data Collected	• Profiles reflecting user attributes • Profiles reflecting user behavior	• Service Providers • Analytics Partners • Parties You Authorize, Access or Authenticate
Cell Phone Contacts	• Cell Phone Contacts	
Images/Photos	• Images and photos from users	
Files	• Files from users	
Videos	• Videos from users	

Note: We collect and upload your (users') files information in our platform. We also collect videos, photos, cell phone contacts, and other images.

Categories of Sources of Personal Data

We collect Personal Data about you from the following categories of sources:

- You
    - When you provide such information directly to us.
        - When you create an account or use our interactive tools and Services.
        - When you voluntarily provide information in free-form text boxes through the Services or through responses to surveys or questionnaires.
        - When you send us an email or otherwise contact us.
    - When you use the Services and such information is collected automatically.
        - Through Cookies (defined in the "Tracking Tools and Opt-Out" section below).
        - If you download our mobile application or use a location-enabled browser, we may receive information about your location and mobile device, as applicable.
        - If you download and install certain applications and software we make available, we may receive and collect information transmitted from your computing device for the purpose of providing you the relevant Services, such as information regarding when you are logged on and available to receive updates or alert notices.
- Third Parties
    - Vendors
        - We may use analytics providers to analyze how you interact and engage with the Services, or third parties may help us provide you with customer support.
        - We may use vendors to obtain information to generate leads and create user profiles.

Our Commercial or Business Purposes for Collecting Personal Data

- Providing, Customizing and Improving the Services
    - Creating and managing your account or other user profiles.
    - Processing orders or other transactions; billing.
    - Providing you with the products, services or information you request.
    - Meeting or fulfilling the reason you provided the information to us.
    - Providing support and assistance for the Services.
    - Improving the Services, including testing, research, internal analytics and product development.
    - Personalizing the Services, website content and communications based on your preferences.
    - Doing fraud protection, security and debugging.
    - Carrying out other business purposes stated when collecting your Personal Data or as otherwise set forth in applicable data privacy laws, such as the California Consumer Privacy Act (the “CCPA”).
- Marketing the Services
    - Marketing and selling the Services.
- Corresponding with You
    - Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about Markit or the Services.
    - Sending emails and other communications according to your preferences or that display content that we think will interest you.
- Meeting Legal Requirements and Enforcing Legal Terms
    - Fulfilling our legal obligations under applicable law, regulation, court order or other legal process, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities.
    - Protecting the rights, property or safety of you, Markit or another party.
    - Enforcing any agreements with you.
    - Responding to claims that any posting or other content violates third-party rights.
    - Resolving disputes.

We will not collect additional categories of Personal Data or use the Personal Data we collected for materially different, unrelated or incompatible purposes without providing you notice.

How We Share Your Personal Data

We disclose your Personal Data to the categories of service providers and other parties listed in this section. Depending on state laws that may be applicable to you, some of these disclosures may constitute a “sale” of your Personal Data. For more information, please refer to the state-specific sections below.

- Service Providers. These parties help us provide the Services or perform business functions on our behalf. They include:
    - Hosting, technology and communication providers.
    - Support and customer service vendors.
    - Product fulfillment and delivery providers.
    - Payment processors.
        - Our payment processing partner Stripe, Inc. (“Stripe”) collects your voluntarily-provided payment card information necessary to process your payment.
        - Please see Stripe’s terms of service and privacy policy for information on its use and storage of your Personal Data.
    - Communications providers like Twilio
- Analytics Partners. These parties provide analytics on web traffic or usage of the Services. They include:

    - Companies that track how users found or were referred to the Services.
    - Companies that track how users interact with the Services.
- Parties You Authorize, Access or Authenticate
    - Third parties you access through the services.
    - Other users.

Legal Obligations

We may share any Personal Data that we collect with third parties in conjunction with any of the activities set forth under “Meeting Legal Requirements and Enforcing Legal Terms” in the “Our Commercial or Business Purposes for Collecting Personal Data” section above.

Business Transfers

All of your Personal Data that we collect may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part). Should one of these events occur, we will make reasonable efforts to notify you

before your information becomes subject to different privacy and security policies and practices.

Data that is Not Personal Data

We may create aggregated, de-identified or anonymized data from the Personal Data we collect, including by removing information that makes the data personally identifiable to a particular user. We may use such aggregated, de-identified or anonymized data and share it with third parties for our lawful business purposes, including to analyze, build and improve the Services and promote our business, provided that we will not share such data in a manner that could identify you.

Tracking Tools and Opt-Out

The Services use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, “Cookies”) to enable our servers to recognize your web browser, tell us how and when you visit and use our Services, analyze trends, learn about our user base and operate and improve our Services. Cookies are small pieces of data– usually text files – placed on your computer, tablet, phone or similar device when you use that device to access our Services. We may also supplement the information we collect from you with information received from third parties, including third parties that have placed their own Cookies on your device(s). Please note that because of our use of Cookies, the Services do not support “Do Not Track” requests sent from a browser at this time.

We use the following types of Cookies:

- Essential Cookies. Essential Cookies are required for providing you with features or services that you have requested. For example, certain Cookies enable you to log into secure areas of our Services. Disabling these Cookies may make certain features and services unavailable.
- Functional Cookies. Functional Cookies are used to record your choices and settings regarding our Services, maintain your preferences over time and recognize you when you return to our Services. These Cookies help us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- Performance/Analytical Cookies. Performance/Analytical Cookies allow us to understand how visitors use our Services. They do this by collecting information about the number of visitors to the Services, what pages visitors view on our Services and how long visitors are viewing pages on the Services. Performance/Analytical Cookies also help us measure the performance of our advertising campaigns in order to help us improve our campaigns and the Services' content for those who engage with our advertising

You can decide whether or not to accept Cookies through your internet browser's settings. Most browsers have an option for turning off the Cookie feature, which will prevent your browser from accepting new Cookies, as well as (depending on the sophistication of your browser software) allow you to decide on acceptance of each new Cookie in a variety of ways. You can also delete all Cookies that are already on your device. If you do this, however, you may have to manually adjust some preferences every time you visit our website and some of the Services and functionalities may not work.

To explore what Cookie settings are available to you, look in the "preferences" or "options" section of your browser's menu. To find out more information

about Cookies, including information about how to manage and delete Cookies, please visit http://www.allaboutcookies.org/.

User Tracking Software

Use of Tracking Technologies

Our software utilizes various user tracking technologies, including but not limited to api-js, js.stripe, m.stripe, r.stripe, maps.googleapis, google. - firebase, maps, Algolia, and Mixpanel, to enhance user experience, gather insights, and improve our services. These technologies help us understand how users interact with our software, identify trends, and make informed decisions to optimize performance and functionality.

Additionally, prior to July 12, 2024, our software contained an inactive Meta Pixel for various individual user tracking purposes. This was removed on July 12, 2024. We incorporated "pixels" provided by Meta Platforms, Inc. (1 Hacker Way, Menlo Park, CA 94025, USA) on our website. This enabled us to track user behavior after they click on a Facebook ad and are redirected to our website. By doing so, we could assess the effectiveness of Facebook ads for statistical and market research purposes and sometimes retarget certain users. Please note that the data collected through this process remains anonymous to us, meaning we do not have access to personal information of individual users. However, Facebook stores and processes this data. Therefore, we are providing you with this information based on our current understanding. It's important to be aware that Facebook may associate this information with your Facebook account and utilize it for its own promotional activities, in accordance with Facebook's Data Usage Policy found at HTTPS://BIT.LY/43CYBSU. You have the option to authorize Facebook and its partners to display advertisements on and off Facebook (HTTPS://BIT.LY/3QJ4VOA). Additionally, a cookie may be stored on your computer for these purposes.

Data Collection

When you use our software, these tracking technologies may collect and process the following types of information:

- Usage Data: Information about how you interact with our software, including pages visited, features used, and time spent on each page.
- Device Information: Details about the device and software you use to access our services, such as IP address, operating system, browser type, and unique device identifiers.
- Event Data: Data related to specific actions you take within the software, such as button clicks, form submissions, and navigation paths.

When you access the Platform through a web browser, we may collect additional data, such as IP addresses, browser types, and usage information. Please refer to our Tracking Tools and Opt-Out section for more details.

Purpose of Data Collection

The data collected through Mixpanel, Meta Pixel, and similar tracking technologies are used for various purposes, including but not limited to:

- Improving User Experience: To analyze user behavior and preferences to enhance the usability and functionality of our software.
- Performance Monitoring: To identify and fix bugs, improve load times, and ensure the software operates smoothly.
- Feature Development: To understand which features are most valuable to users and prioritize future development accordingly.

User Consent and Control

By using our software, you consent to the use of tracking technologies as described in this section. You have the option to manage your preferences and control the collection of data through various means:

- Browser Settings: You can configure your browser to block or notify you about tracking technologies.
- Opt-Out Mechanism SMS/RCS: We provide opt-out options where applicable, allowing you to disable tracking for certain activities or data collection when you email our contact email at hello@markitai.com.
- Privacy Settings: Access the privacy settings within our software to manage your data preferences and control how your information is used.

Third-Party Services

Please note that api-js, js.stripe, m.stripe, r.stripe, maps.googleapis, google. - firebase, maps, Algolia, and Mixpanel, and other third-party tracking services have their own privacy policies and data handling practices. We encourage you to review these policies to understand how your data may be processed by these providers.

Changes to This Section

We reserve the right to update or modify this section at any time to reflect changes in our practices or applicable laws. Any changes will be effective immediately upon posting the revised terms. Your continued use of our software after such changes signifies your acceptance of the updated terms.

If you have any questions or concerns about our use of tracking technologies, please contact us at hello@markitai.com

Data Security and Retention

We seek to protect your Personal Data from unauthorized access, use and disclosure using appropriate physical, technical, organizational and administrative security measures based on the type of Personal Data and how we are processing that data. You should also help protect your data by appropriately selecting and protecting your password and/or other sign-on mechanism; limiting access to your computer or device and browser; and signing off after you have finished accessing your account. Although we work to protect the security of your account and other data that we hold in our records, please be aware that no method of transmitting data over the internet or storing data is completely secure.

We retain Personal Data about you for as long as you have an open account with us or as otherwise necessary to provide you with our Services. In some cases we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule or regulation. We may

further retain information in an anonymous or aggregated form where that information would not identify you personally.

Export Security Measures

To ensure the protection of exported phone numbers and related data, the platform has implemented the following security measures:

- Exported data is available only to authorized users with valid credentials;
- All exports are encrypted and delivered via secure methods;
- Users are required to handle exported data in compliance with applicable laws and these policies, including safeguarding it from unauthorized access or misuse;
- Logs of all export activities, including the user account, timestamp, and data volume, are maintained for auditing and compliance purposes.

Users acknowledge their responsibility to maintain the confidentiality and security of exported data. Any misuse or failure to adhere to these security measures may result in account suspension or termination and potential legal action.

Data Retention Policies

Exported data, including phone numbers, will be retained only for as long as necessary to fulfill the purposes for which it was collected or as required by applicable laws and regulations. Users are responsible for ensuring that exported data is:

- Not retained beyond the duration needed for lawful marketing purposes;
- Deleted or securely archived once it is no longer necessary for its original purpose; and
- Managed in compliance with applicable data protection regulations, including but not limited to the GDPR and CCPA.

The platform may retain export activity logs for a longer duration as necessary to comply with legal, auditing, or regulatory requirements. Users must

securely handle and delete exported data once its use has been fulfilled to avoid unauthorized access or misuse.

Compliance Documentation

To ensure compliance with applicable SMS/RCS marketing laws and data protection regulations, users who upload or collect data externally are required to maintain records documenting:

- The method and date of consent obtained from individuals whose data is uploaded;
- The purpose for which phone numbers and related data were collected and used; and
- Any subsequent actions related to the data, such as updates, exports, or deletions.

Users agree to provide such documentation upon request to verify compliance with these policies and applicable laws, including the TCPA, GDPR, and CCPA. Failure to maintain or provide compliance documentation may result in restricted access to platform features or account suspension.

Additionally, we require users to check a box verifying compliance and taking responsibility for any liability of their external data upon uploading a spreadsheet or connecting an external platform data via Markit's Integrations.

Third-Party Compliance

Users who engage third-party services to process, store, or send SMS/RCS communications using data collected or exported from the platform are responsible for ensuring that such third parties comply with applicable SMS/RCS marketing laws and data protection regulations, including but not limited to the TCPA, GDPR, and CCPA.

Specifically, users must:

- Verify that third-party services implement adequate security measures to protect exported data;
- Ensure that third-party services adhere to lawful consent requirements for SMS/RCS communications; and
- Execute agreements with third-party providers that include provisions for data protection and compliance with relevant laws.

Markit is not responsible for any violations or misuse of data by third-party services engaged by users. Any such violations are the sole responsibility of the user.

Breach Notification

Users are required to promptly notify Markit in the event of a data breach involving exported phone numbers or other personal data obtained through the platform. This notification must include:

- A detailed description of the breach, including the type of data involved and the scope of the breach;
- The date and time the breach occurred or was discovered;
- Actions taken to mitigate the breach and prevent further unauthorized access; and
- Contact information for the user or organization responsible for managing the breach response.

Notifications must be submitted to hello@markitai.com within 48 hours of discovering the breach. Markit reserves the right to take appropriate actions, including account suspension, to protect data integrity and ensure compliance with applicable laws.

Failure to notify Markit promptly of a breach may result in penalties, legal action, or regulatory reporting obligations.

Transparency in Export Use

For compliance and security purposes, Markit logs all export activities conducted on the platform. This includes details such as:

- The user account initiating the export;
- The date and time of the export; and
- The type and volume of data exported.

These logs may be reviewed periodically to ensure adherence to these policies and applicable laws. Users acknowledge and agree that Markit reserves the right to take appropriate action, including account suspension or termination, in response to suspicious or unauthorized activity.

This data is used solely for auditing and compliance purposes and will not be shared with third parties except as required by law.

Personal Data of Children

We do not knowingly collect or solicit Personal Data about children under 13 years of age; if you are a child under the age of 13, please do not attempt to register for or otherwise use the Services or send us any Personal Data. If we learn we have collected Personal Data from a child under 13 years of age, we will delete that information as quickly as possible. If you believe that a child under 13 years of age may have provided Personal Data to us, please contact us at hello@markitai.com.

California Resident Rights

If you are a California resident, you have the rights set forth in this section. Please see the “Exercising Your Rights” section below for instructions regarding how to exercise these rights. Please note that we may process Personal Data of our customers’ end users or employees in connection with our provision of certain services to our customers. If we are processing your Personal Data as a service provider, you should contact the entity that

collected your Personal Data in the first instance to address your rights with respect to such data.

If there are any conflicts between this section and any other provision of this Privacy Policy and you are a California resident, the portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following rights apply to you, please contact us at hello@markitai.com.

Access

You have the right to request certain information about our collection and use of your Personal Data over the past 12 months. In response, we will provide you with the following information:

- The categories of Personal Data that we have collected about you.
- The categories of sources from which that Personal Data was collected.
- The business or commercial purpose for collecting or selling your Personal Data.
- The categories of third parties with whom we have shared your Personal Data.
- The specific pieces of Personal Data that we have collected about you.

If we have disclosed your Personal Data to any third parties for a business purpose over the past 12 months, we will identify the categories of Personal Data shared with each category of third party recipient. If we have sold your Personal Data over the past 12 months, we will identify the categories of Personal Data sold to each category of third party recipient.

Deletion

You have the right to request that we delete the Personal Data that we have collected about you. Under the CCPA, this right is subject to certain exceptions: for example, we may need to retain your Personal Data to provide you with the Services or complete a transaction or other action you have requested. If your deletion request is subject to one of these exceptions, we may deny your deletion request.

Exercising Your Rights

To exercise the rights described above, you or your Authorized Agent (defined below) must send us a request that (1) provides sufficient information to allow us to verify that you are the person about whom we have collected Personal Data, and (2) describes your request in sufficient detail to allow us to understand, evaluate and respond to it. Each request that meets both of these criteria will be considered a "Valid Request." We may not respond to requests that do not meet these criteria. We will only use Personal Data provided in a Valid Request to verify your identity and complete your request. You do not need an account to submit a Valid Request.

We will work to respond to your Valid Request within 45 days of receipt. We will not charge you a fee for making a Valid Request unless your Valid Request(s) is excessive, repetitive or manifestly unfounded. If we determine that your Valid Request warrants a fee, we will notify you of the fee and explain that decision before completing your request.

You may submit a Valid Request using the following methods:

- Email us at: hello@markitai.com
- Text us at: 617-213-0897

You may also authorize an agent (an "Authorized Agent") to exercise your rights on your behalf. To do this, you must provide your Authorized Agent with

written permission to exercise your rights on your behalf, and we may request a copy of this written permission from your Authorized Agent when they make a request on your behalf.

Personal Data Sales Opt-Out and Opt-In

We will not sell your Personal Data, and have not done so over the last 12 months. To our knowledge, we do not sell the Personal Data of minors under 16 years of age.

We Will Not Discriminate Against You for Exercising Your Rights Under the CCPA

We will not discriminate against you for exercising your rights under the CCPA. We will not deny you our goods or services, charge you different prices or rates, or provide you a lower quality of goods and services if you exercise your rights under the CCPA. However, we may offer different tiers of our Services as allowed by applicable data privacy laws (including the CCPA) with varying prices, rates or levels of quality of the goods or services you receive related to the value of Personal Data that we receive from you.

Other State Law Privacy Rights

California Resident Rights

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to contact us to prevent disclosure of Personal Data to third parties for such third parties' direct marketing purposes; in order to submit such a request, please contact us at hello@markitai.com.

Nevada Resident Rights

If you are a resident of Nevada, you have the right to opt-out of the sale of certain Personal Data to third parties who intend to license or sell that Personal Data. You can exercise this right by contacting us at hello@markitai.comwith 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 Data as sales are defined in Nevada Revised Statutes Chapter 603A.

Changes to this Privacy Policy

We’re constantly trying to improve our Services, so we may need to change this Privacy Policy from time to time, but we will alert you to any such changes by placing a notice on the Markit website, by sending you an email and/or by some other means. Please note that if you’ve opted not to receive legal notice emails from us (or you haven’t provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them. If you use the Services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes. Use of information we collect is subject to the Privacy Policy in effect at the time such information is collected.

Contact Information:

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your Personal Data or your choices and rights regarding such collection and use, please do not hesitate to contact us at:

- 617-213-0897

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