

Privacy Policy

Last Revised: [March 2025]

This privacy policy includes the provisions set forth herein and the Data Protection Agreement (available to view in Section 11) ("Privacy Policy") are designed to inform you of the policies and procedures that will apply to the collection, security, use and disclosure of any of your Personal Data (defined below) collected by Curebit, Inc. dba Talkable ("Talkable", "we", "us", or "our") through [Talkable.com](https://talkable.com) ("Site") or in connection with our products and services ("Services"). It also describes your choices regarding use, access and correction of your Personal Data. Please contact us with any questions you have about this Privacy Policy at: security@talkable.com

PLEASE READ THIS POLICY CAREFULLY, ESPECIALLY IF YOU ARE AN AUTHORIZED USER, END-USER, OR VISITOR (AS THOSE TERMS ARE DEFINED IN SECTION 2 BELOW). BY PROCEEDING TO USE OUR SITE AND/OR SERVICES YOU CONSENT THAT WE MAY PROCESS THE PERSONAL DATA THAT WE COLLECT FROM YOU IN ACCORDANCE WITH THIS PRIVACY POLICY.

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1. Changes to This Privacy Policy

We may modify this Privacy Policy from time to time to reflect changes to our information practices, so check back frequently. Any changes to this Privacy Policy will be posted on this page, and where appropriate (for example, if there are material changes to this policy), we will notify you by e-mail or by means of a notice on our home page prior to the changes taking effect.

2. Information We Collect from You

2.1. Overview. Our primary goals are to provide and improve our products and services, to provide quality customer service, to respond to your and to enable users to effectively navigate the Site. We may collect Personal Data and Non-Personal Data about you and process the same as set forth herein.

Personal Data means data that allows someone to identify or contact you, including, for example, your first and last name, address, telephone number, e-mail address, as well as any other non-public information about you that is associated with or linked to any of the foregoing data. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of Personal Data about you which we have grouped together as follows:

- Identity Data, which includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender, a visual image of your face, tax identification number, national identity cards, passports or other

form of identification documents including proof of address such as a utility bill or bank statement.

- Contact Data, which includes billing address, delivery address, home address, work address, email address and telephone numbers.
- Financial Data, which includes bank account and payment card details.
- Transaction Data, which includes details about payments to and from you and other details of any transactions you enter into using products and services you have purchased from us and/or Merchants.
- Technical Data, which includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location data, browser plug-in types and versions, operating system and platform, and other technology or information stored on the devices you allow us access to when you visit the Site, such as friends lists or other digital content.
- Profile Data, which includes your username and password, requests by you for products or services, your interests, preferences, and feedback.
- Usage Data, which includes information about how you use our Site and Services.
- Marketing and Communications Data, which includes your preferences in receiving marketing from us and our third parties and your communication preferences.

2.2 Merchant Data, Authorized User Data, and Visitor Data

Talkable provides its clients (each, a “Merchant”) with an array of tools and features to better manage and optimize their end-users’ experience and interaction with the Merchant, including, without limitation, the Talkable Referral Program, the Talkable Conversion Program, and the Talkable Loyalty Program (each, a “Talkable Program” and collectively, the “Talkable Programs”). References to the “Services” shall include the Talkable Programs.

This Privacy Policy describes how we collect, store, use, and disclose the following types of Personal Data from the following categories of users:

- Merchant Data: Merchant Data includes Personal Data that we collect, process and manage on Merchants’ behalf as part of the Talkable Programs (the “Merchant Data”). Merchant Data relates to individuals who register as end-users (the “End-Users”), place purchases on, or otherwise interact with Merchants’ online stores, and to their interactions with our Services;
- Authorized User Data: Authorized User Data includes Personal Data relating to Merchants and their authorized users (collectively, the “Authorized Users”, and such data, the “Authorized User Data”) collected in connection with their account with Talkable.
- Visitor Data: data relating to visitors (including prospective clients or other partners of Talkable) of the Site (collectively, the “Visitors”, and such data, the “Visitor Data”), including, without limitation, any interaction with any online ads and content under Talkable’s control;

2.2.1 Merchant Data:

We may hold the following Merchant Data about End-Users:

- First and Last Name;
- Email Addresses;
- Phone Number;
- Mailing Address;
- The order details and order history of purchases of goods and/or services you have made with the applicable Merchant;
- Photos and Videos (depending on how you interact with the Talkable Programs);
- IP Address; and
- Unique identifiers, such as account name and passwords.

Talkable processes Merchant Data strictly on Merchants' behalf, in accordance with their reasonable instructions, and as further stipulated in our Data Processing Addendum (see Section 11.2 to download a copy of our template Data Processing Addendum) (or such other data processing addendum agreed to by Talkable and the Merchant) and any other commercial agreements with such Merchant. As such, and to the extent applicable, Merchants will be deemed the 'data controllers' (e.g. under the EU GDPR, UK GDPR and similar laws) or 'businesses' (under the CCPA/CPRA or similar laws) of Merchant Data, and Talkable will be deemed the 'data processor' or 'service provider' when processing such data.

As the controller of Merchant Data, the Merchant will be solely responsible for determining whether and how they wish to use the Talkable Programs and meeting any and all legal requirements applicable to controllers under all applicable data privacy laws (such as establishing a legal basis for processing, collecting appropriate consent and providing adequate notice to End-Users whose data may be contained in Merchant Data, and responding to Data Subject Rights requests concerning the data they control).

Merchants may have their own privacy policies that govern the Personal Data collected in connection with their use of our Services, and you should consult the policies of and/or contact the applicable Merchant to see how they process and share your Personal Data, including with respect to any rights you may have to such personal information.

2.2.2 Authorized User Data:

We may collect and hold the following Authorized User Data about Authorized Users:

- First and Last Name; and
- Email Addresses.

Talkable is both a “data controller” and “data processor” of Authorized User Data. Such data is processed by Talkable for its own purposes (as described below) as an independent “controller”; while certain portions of it which may be included in Merchant Data are processed by us on Merchants’ behalf as a “processor”.

2.2.3 Visitor Data:

We may collect and hold the following Visitor Data about Visitors:

- Website usage information (see Section 6); and
- Direct interactions and communications with us (including emails, form submissions and chats with us, including in connection with any client support or feedback).

Talkable is the “data controller” of Visitor Data. With respect to such data, Talkable assumes the responsibilities of data controller (solely to the extent applicable under law) as set forth in this Privacy Policy. In such instances, our Service Providers processing such data will assume the role of “data processor”.

We do not collect or hold any Special Categories of Personal Data (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offenses.

3. How Do We Use Your Personal Data?

We will use your Personal Data to:

- carry out our obligations arising from any agreements entered into between you and us;
- provide you with our Services products or information, you have requested from us;
- notify you about changes to our Services;
- ensure that content from our Services are presented in the most effective manner for you and your device;
- improve the Services; and
- contact you with certain marketing or promotional materials, as well as other information that may be of interest to you (if you no longer consent to such use please send us an email so stating to support@talkable.com or follow the unsubscribe instructions provided in any of the communications);

4. Purposes for Which We Will Use Your Personal Data

We have set out below, in a table format, a description of all the ways we plan to use your Personal Data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your Personal Data for more than one lawful ground depending on the specific purpose for which we are using your data. Contact us at security@talkable.com if you need details about the specific legal ground we are relying on to process your Personal Data where more than one ground has been set out in the table below.

| Purpose/Activity | Type of Data | Lawful Basis for Processing Including Basis of Legitimate Interest |
|--|--|---|
| For the purposes of your subscription and the administration of our Site and Services | (a) Identity (b) Contact | Performance of our agreement with you |
| To carry out Services | (a) Identity (b) Contact (c) Marketing and Communications | Performance of our agreement with you |
| To improve and provide you with customer service | (a) Identity (b) Contact (c) Profile (d) Marketing and Communications | (a) Performance of our agreement with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our Site/Services) |
| To administer and maintain our Site and Services (including troubleshooting, data analysis, testing, | (a) Identity (b) Contact (c) Technical | (a) Necessary for our legitimate interests (for running our business, provide for the |

| | | |
|---|--|--|
| system maintenance, support, reporting and hosting of data) | | administration and IT services, network security, and to prevent fraud) (b) Necessary to comply with our legal obligations |
| To contact you (including sending information and updates relating to our Site and Services) | (a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical | Necessary for our legitimate interests (to study how users use our Site and Services, and to develop them) |
| To use data analytics to improve our Site and Services, marketing, customer relationships and experiences | (a) Technical (b) Usage | Necessary for our legitimate interests (to define types of users for our products and services, to keep our Site and Services updated and relevant and to inform our marketing strategy) |
| To make suggestions and recommendations to you about goods or services that may be of interest to you | (a) Identity (b) Contact (c) Technical (d) Usage (e) Profile | Necessary for our legitimate interests (to develop our Services) |

5. Change of Purpose

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please us at security@talkable.com.

If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

PLEASE NOTE THAT WE MAY PROCESS YOUR PERSONAL DATA WITHOUT YOUR KNOWLEDGE OR CONSENT, IN COMPLIANCE WITH THE ABOVE RULES, WHERE THIS IS REQUIRED OR PERMITTED BY LAW.

6. Non-Personal Data We Collect from You

6.1. Non-Personal Data. Non-Personal Data means data that is not associated with or linked to your Personal Data; Non-Personal Data does not, by itself, permit the identification of individual persons.

6.2. Log Data. When you visit the Site, we automatically collect technical and statistical data about your visit, such as your browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data, the pages you visit and any search terms you use ("Log Data").

6.3. IP Address. We also collect your public IP address when you visit the Site. We may use your public IP address in order to determine whether certain requests are fraudulent or frivolous and we may automatically cross-reference your public IP address with your domain name (usually the domain name of your ISP or employer). Because you may be visiting the Site from your personal residence (for example, because you are telecommuting), your IP address and any associated domain name are treated as "Personal Network Information" instead of Personal Data. "Log Data" does not include Personal Network Information. Although such Personal Network Information may be used to administer and maintain the Site and Services, it is not shared with any third parties, except as described below in the sections titled "Service Providers," "Compliance with Laws and Law Enforcement" and "Business Transfers". We will use Log Data for any purpose.

PLEASE NOTE: DEPENDING ON YOUR JURISDICTION YOUR IP ADDRESS MAY BE CONSIDERED PERSONAL DATA. IN ALL SUCH CASES IT WILL BE ACCORDINGLY TREATED AS SUCH.

6.4. Cookies. We use many different cookies on our Site. If you do not know what cookies are, or how to control or delete them, then we recommend you visit aboutcookies.org for detailed guidance. Cookies allow us to identify and authenticate visitors, track aggregate behavior, and enable important website features. We use both session ID cookies and persistent cookies. A session ID cookie expires when you close your browser. A persistent cookie remains on your hard drive for an extended period, and we use that to identify you should you return to our Site and want to find information that you had started even if you are not logged in, or don't have a user account. Session cookies are used to maintain your shopping state as you browse through our Site. We also contract with analytics services and third party affiliate services to collect similar information for specific purposes. The use of cookies by our partners is not covered by this Privacy Policy. Though you may disable cookies through your web browser, doing so may prevent you from taking advantage of some of our Site's features. To opt out of these collection services, please see the section "Your

Choices” below. The use of cookies by our partners is not covered by this Policy. To opt out of the services related to these cookies, please see section “Your Choices” below. Please note that if you block certain of these cookies, certain features of our Services may not work.

Some of our cookies may collect your Personal Data. Specifically, Talkable may utilize uuid cookies, which may collect your IP address.

6.5. Web Beacons/Tags. We automatically collect aggregate anonymous information through web beacons. Website beacons allow third parties to provide anonymized, aggregated auditing, research and reporting for us.

6.6. Use of Non-Personal Data. We may also use your Log Data and Personal Network Information to: (i) administer our Site and Services for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes; (ii) improve our Site to ensure that content is presented in the most effective manner for you and for your device; (iii) allow you to participate in interactive features of our Service and Site, when you choose to do so; (iv) as part of our efforts to keep our Site and Services safe and secure.

6.7. Pixel Tags. In addition, we use “Pixel Tags” (also referred to as clear Gifs, Web beacons, or Web bugs). Pixel Tags are tiny graphic images with a unique identifier, similar in function to cookies, that are used to track online movements of Web users. In contrast to Cookies, which are stored on a user’s computer hard drive, Pixel Tags are embedded invisibly in Web pages. Pixel Tags also allow us to send e-mail messages in a format users can read, and they tell us whether e-mails have been opened to ensure that we are sending only messages that are of interest to our users. We may use this information to reduce or eliminate messages sent to users. We do not tie the information gathered by Pixel Tags to Personal Data.

6.8. Flash LSOs. When we post videos, third parties may use local shared objects, known as “Flash Cookies,” to store your preferences for volume control or to personalize certain video features. Flash Cookies are different from browser Cookies because of the amount and type of data and how the data is stored. Cookie management tools provided by your browser will not remove Flash Cookies. To learn how to manage privacy and storage settings for Flash Cookies, click [here](#).

6.9. Google Analytics. We may use Google Analytics to help analyze how users use the Site. Google Analytics uses Cookies to collect information such as how often users visit our Site and Services, what pages they visit, and what other sites they used prior to coming to our Site. We use the information we get from Google Analytics only to improve our Site. Google Analytics collects only the IP address assigned to you on the date you visit the Site, rather than your name or other Personal Data. We do not combine the information generated through the use of Google Analytics with your Personal Data. Although Google Analytics plants a persistent Cookie on Your web browser to identify you as a unique user the next time you visit the Site and use

Services, the Cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about your visits to our Site and use of Services are governed by the Google Analytics' Terms of Use and Privacy Policy.

7. Aggregated Data

After removing any information that would personally identify you from within the set of Personal Data, Personal Network Information and Log Data we collect from you, we may combine that information with information we collect from other users and customers (collectively the "Aggregated Data") in order to improve the quality and value of Services and to analyze and understand how our Site is used. We may share Aggregated Data (after stripping of any information that would personally identify you) and Log Data with third parties for industry analysis, demographic profiling, and other purposes.

8. Your Choices

8.1. How You Can Access or Correct Your Information. You can access a variety of your Personal Data that we collect online and maintain it either online, or by contacting our customer service representatives via email at support@talkable.com. We use this procedure to better safeguard your information. You can correct factual errors in your Personal Data by sending us a request that credibly shows error. To protect your privacy and security, we will also take reasonable steps to verify your identity before granting access or making corrections.

8.2. How You Can Request for Your Information To Be Deleted. You can ask us to erase or delete all or some of your Personal Data (provided it is no longer necessary for legal purposes or to provide services to you). You may place a request by contacting our customer service representatives via email at support@talkable.com or by calling our toll free number at [1-888-914-9661](tel:1-888-914-9661) and entering pin 641060. We will delete all your Personal Data that we are not legally required to maintain within 30 days. We will also take reasonable steps to verify your identity before proceeding with deletion. Please realize that if you initialize this request while you have outstanding orders, those orders will be canceled.

8.3. Opting out.

Analytics. You may opt-out of Google Analytics by [following this link](#).

Google AdWords. Google AdWords remarketing service is provided by Google Inc. You can opt-out of Google Analytics for Display Advertising and customize the Google Display Network ads by visiting the [Google Ads Settings page](#).

Cookies. You may disable, or delete cookies in your Web browser, but doing so may impact the usability of the website. To block cookies, you can also browse the site using your browser's anonymous usage setting (called "Incognito" in Chrome, "InPrivate" for Internet Explorer, "Private Browsing" in Firefox and Safari etc.)

9. Information Sharing & Disclosure

9.1. Service Providers. We may from time to time use certain third-party business partners, suppliers, and sub-contractors (“Services Providers” or “Subprocessors”) to perform Site-related services (for example, without limitation, website hosting, maintenance services, database management, Web analytics, and improvement of our Site and Services. These Service Providers have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose. For a list of Talkable’s current Subprocessors, please see [here](#).

9.3. Compliance with laws and law enforcement. Talkable cooperates with government and law enforcement officials and private parties to enforce and comply with the law. We may disclose your Personal Data to government or law enforcement officials or private parties in response to lawful requests if we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation (such as to meet national security or law enforcement requirements), to enforce or apply our terms and conditions or respond to claims and legal process, to protect the property and rights of Talkable or a third party, to protect the safety of the public or any person, or to prevent or stop any illegal, unethical or legally actionable activity (including for the purposes of fraud protection).

9.4. Business Transfers/Corporate Restructuring. If Talkable is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via e-mail and/or a prominent notice on our Site of any change in ownership or uses of your Personal Data, as well as any choices you may have regarding your Personal Data.

9.5. Affiliates. We may share some or all of your Personal Data with our parent company, subsidiaries, joint ventures, or other company’s under a common control (“Affiliates”), in which case we will require our Affiliates to honor this Privacy Policy.

10. California Privacy Rights

We have created a separate California Privacy Notice that applies to you solely if you reside in the State of California. We adopt this notice to comply with California privacy laws, including the California Consumer Privacy Act of 2018 (“CCPA”), the California Privacy Rights Act of 2020 (“CPRA”), and California’s “Shine the Light” law (collectively, “California Law”). If you are a resident of the State of California, we urge you to review our California Privacy Notice so that you understand how we collect, use, and disclose your Personal Information (as defined under California Law) and of your rights under California Law.

11. International Transfers & Data Processing Agreement

11.1. International Data Transfer. Information collected in the European Economic Area (“EEA”) may be transferred, stored and processed by us and our service providers in the United States and other countries whose data protection laws may be different

from the laws of your country. Whenever we transfer your Personal Data out of the EEA, we ensure a similar degree of protection is afforded to it by entering into the European Commission's model contracts for the transfer of personal data to third countries (i.e., the standard contractual clauses pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data) with the relevant provider.

Please contact us at security@talkable.com if you want further information on the specific mechanism used by us when transferring your Personal Data out of the EEA.

11.2. Data Processing Agreement. We use and protect Personal Data you provide use in accordance with applicable laws. Accordingly, Talkable processes Merchant Data strictly in accordance with such Merchant's reasonable instructions and as further stipulated in our Data Processing Agreement (a copy of which can be downloaded below) or any other similar data processing agreement entered into with such Merchant.

DOWNLOAD DATA PROCESSING AGREEMENT

12. Your Rights

Under certain circumstances, you have rights the following rights under Data Protection laws:

12.1. Request access to your Personal Data. Request access to your Personal Data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

12.2. Request correction of your Personal Data. Request correction of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

12.3. Request erasure of your Personal Data. Request erasure of your Personal Data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your Personal Data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request. We may not immediately be able to delete all residual copies from our servers and backup systems after the active data have been deleted. Such copies shall be deleted as soon as reasonably possible.

12.4. Object to processing of your Personal Data. Object to processing of your Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which overrides your rights and freedoms.

12.5. Request restriction of processing your Personal Data. Request restriction of processing of your Personal Data. This enables you to ask us to suspend the processing of your Personal Data in the following scenarios: (i) if you want us to establish the data's accuracy; (ii) where our use of the data is unlawful but you do not want us to erase it; (iii) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (iv) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

12.6. Request transfer of your Personal Data. Request the transfer of your Personal Data to you or to a third party. We will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

12.7. Right to withdraw consent. Withdraw consent at any time where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us at support@talkable.com.

If your request relates to Merchant Data, you should contact such Merchant directly, as such Merchant is the "data controller" of such Merchant Data and exclusively determines how such Merchant Data may be processed, including if and how your request should be handled. Because we are a processor, and not controller, of Merchant Data, if we receive any requests to exercise any rights with respect to Merchant Data, we are not able to directly accommodate such requests but will forward such requests to the applicable Merchant (or otherwise follow the procedure we have agreed upon with the applicable Merchant).

13. Additional Information about Your Rights

13.1. No fee usually required. You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee

if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

13.2. What we may need from you. We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

13.3. Time limit to respond. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

14. Dispute Resolution (E.U. Residents)

14.1. General. If you reside in E.U. and have any questions or concerns regarding the use or disclosure of Personal Data, you should first contact us for assistance. We will promptly investigate and attempt to resolve all complaints regarding our use of Personal Data. In the event we are unable to mutually resolve a complaint; we will work with you and agree to refer your complaint to an independent dispute resolution mechanism.

14.2. Questions and concerns. Any questions or concerns regarding the use or disclosure of Personal Data should first be directed to us. We will promptly investigate and attempt to resolve all complaints regarding our use of Personal Data. In the event we are unable to mutually resolve a complaint; we will work with you and agree to refer your complaint to an independent dispute resolution mechanism. You may also work with the Data Protection Authority in your country: https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm to assist with this process as well.

15. Privacy Rights & Data Protection Officer

15.1. General. You may modify the information you have provided to us at any time through your Account. You can also opt-out of receiving marketing communications, deactivate, or delete your Account at any time.

15.2. Data Protection Officer. We have appointed a Data Protection Officer to ensure continued commitment to privacy and security practices. For further information please contact us at: security@talkable.com.

16. Information Security & Confidentiality

We maintain (and require its subcontractors and service providers to maintain) appropriate organizational and technical measures designed to protect the security and

confidentiality of any information we process. However, no organizational or technical measures are 100% secure so you should take care when disclosing information online and act reasonably to protect yourself online.

17. Data Retention

(a) How long will you use my Personal Data for?

We will only retain your Personal Data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six (6) years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: Please contact us for further information.

In some circumstances we may anonymize your Personal Data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

18. Security

We are concerned with safeguarding your information. We employ generally accepted standards of administrative, physical, procedural, and technological measures designed to protect your information from unauthorized access, both during transmission and once it is received. If you have any questions about the security of your Personal Data, you can contact us at security@talkable.com.

However, please note that no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, although Talkable complies with its legal obligations in respect of the security of your Personal Data we cannot guarantee its absolute security.

19. Links to Other Sites

Our Site contains links to other websites. If you click on a third-party link you will be directed to that third party's website. We do not exercise control over third-party

websites. These other websites may place their own cookies or other files on your computer, collect data or solicit personally identifiable information from you. This Privacy Policy addresses the use and disclosure of information that we collect from you through our Site and/or Service. Other websites follow different rules regarding the use or disclosure of the Personal Data you submit to them. We encourage you to read the privacy policies or statements of the other websites you visit. The fact that we link to a website is not an endorsement, authorization, or representation of our affiliation with that third party, nor is it an endorsement of their privacy or information security policies or practices.

20. Our Policy toward Children

Neither our Site nor Services are directed to children under 16. If a parent or guardian becomes aware that his or her child has provided us with personal or contact information without their consent, he or she should contact us at security@talkable.com. If we become aware that a child under 16 has provided us with Personal Data, we will delete such information from our files immediately.

21. Download a Copy of Our Privacy Policy

You can download a PDF version of our Privacy Policy [here](#).

22. Contacting Us

If you have any questions or complaints about how we use your Personal Data, please contact us at:

Talkable
261 Market Street #4588
San Francisco, CA 94114