Last updated: January 2024

At Rootly, we take your privacy seriously. Please read this Privacy Policy to learn how we treat your Personal Data. **By using or accessing our Services in any manner, you acknowledge that you accept the practices and policies outlined below, and you hereby acknowledge that we will collect, use and share your information as described in this Privacy Policy.**

Remember that your use of Rootly'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. If you have a disability, you may access this Privacy Policy in an alternative format by contacting privacy@rootly.com.

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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 Disclose this Personal Data:**
Contact Data	• First and last name • Email	• Parties You Authorize, Access or Authenticate
Profile Data	• Unique identifiers such as account name and passwords	• N/A
Payment Data	The following information, which is collected and processed by our payment processing partner: • Payment card type • Credit or debit card number • Billing address and email	• Service Providers (specifically our payment processing partner, currently Stripe, Inc.)
Device/IP Data	• IP address • Device ID • Domain server • Type of device/operating system/browser used to access the Services	• Analytics Partners
Web Analytics	• Referring webpage/source through which you accessed the Services • Non-identifiable request IDs	• Analytics Partners
Geolocation Data	• IP-address-based location information	• Analytics Partners

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 use a location-enabled browser, we may receive information about your location.
        - 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.
    - Social Networks
        - If you provide your social network account credentials to us or otherwise sign in to the Services through a third-party site or service, some content and/or information in those accounts may be transmitted into your account with us.

Our Commercial or Business Purposes for Collecting Personal Data

- **Providing, Customizing and Improving the Services**
    - Creating and managing your account or other user profiles.
    - 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 Rootly 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, Rootly 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 Disclose Your Personal Data

We disclose your Personal Data to the categories of service providers and other parties listed in this section.

- **Service Providers.** These parties help us provide the Services or perform business functions on our behalf. They may include:
    - Hosting, technology and communication providers.
    - Payment processors (currently, Stripe).
- **Artificial Intelligence Companies.** These parties also help us provide certain portions of the Services on our behalf. They may include companies specializing in generative AI or large language models.
- **Analytics Partners.** These parties provide analytics on web traffic or usage of the Services. They may 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.

Legal Obligations

We may disclose 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 disclose 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 disclose 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. For example, Google LLC ("Google") uses cookies in connection with its Google Analytics services. Google's ability to use and disclose information collected by Google Analytics about your visits to the Services is subject to the Google Analytics Terms of Use and the Google Privacy Policy. You have the option to opt-out of Google's use of Cookies by visiting the Google advertising opt-out page at https://www.google.com/privacy_ads or the Google Analytics Opt-out Browser Add-on at https://tools.google.com/dlpage/gaoptout.

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 or https://ico.org.uk/for-the-public/online/cookies if you are located in the European Union or the United Kingdom.

Data Security, Retention, and Deletion

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.

Generally, we retain Personal Data about you for as long as you have an open account with us, until you request deletion of your Personal Data (as described below), or as otherwise necessary to provide you with our Services. In some cases we may retain Personal Data for longer, if doing so is, for example, 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.

You may request deletion of your personal data by sending a request to privacy@rootly.com . Please note that your right to deletion will be subject to certain requirements and exceptions in accordance with privacy laws that provide for such right, such as the CCPA (see the "California Resident Rights" section below) or the GDPR (please see the European Data Subject Rights" section below).

Personal Data of Children

As noted in the Terms of Use, we do not knowingly collect or solicit Personal Data about children under 16 years of age; if you are a child under the age of 16, 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 16 years of age, we will delete that information as

quickly as possible. If you believe that a child under 16 years of age may have provided Personal Data to us, please contact us at privacy@rootly.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 privacy@rootly.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, if at all.
- 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.

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.

Correction

You have the right to request that we correct any inaccurate Personal Data that we retain about you. Once we receive and verify your request, we will use commercially reasonable efforts to correct (and direct our service providers and contractors to correct) your Personal Data in our records, unless the information is found to be accurate.

Exercising Your Rights

To exercise the rights described above, you or your Authorized Agent (defined below) must send us a request and any required supplemental information that (1) provides sufficient information to allow us to verify that you are the person about whom we have collected Personal Data (such as your login credentials), and (2) describes your request in sufficient detail to allow us to understand, evaluate and respond to it. The information we require may vary depending on the nature of your request. 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:

- Call us at: +1 (415)-812-1144
- Email us at: privacy@rootly.com

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

Depending on your state of residence, you may have certain rights regarding our use of your Personal Data, which may include the right to:

- Confirm whether we process your Personal Data.
- Access and delete certain Personal Data.
- Correct inaccuracies in your Personal Data, taking into account the information's nature and processing purpose.
- Data portability.
- Opt-out of Personal Data processing for:
    - targeted advertising; or
    - profiling in furtherance of decisions that produce legal or similarly significant effects.
- Either limit (opt-out of) or require consent to process certain sensitive Personal Data.

The exact scope of these rights may vary by state. To exercise any of these rights, please contact us at privacy@rootly.com or call us at +1 (415)-812-1144. If your request is denied, you may have the right to appeal the denial depending on your state of residence. Where applicable, we will provide you with instructions on the appeal process when the denial is made.

Nevada Resident Rights

Nevada provides its residents with a limited right to opt-out of the sale of certain Personal Data to third parties, to the extent such sales occur. You can exercise this right by contacting us at privacy@rootly.com with the subject line "Nevada Do Not Sell Request" and providing us with your name and the email address associated with your account. However, please know we do not currently sell information triggering Nevada's opt-out requirements.

European Data Subject Rights

European Residents

If you are a resident of the European Union ("EU"), United Kingdom, Lichtenstein, Norway or Iceland, you may have additional rights under the EU General Data Protection Regulation (the "EU GDPR"), the EU GDPR as it forms part of the law of England and Wales by virtue of section 3 of the European Union (Withdrawal) Act 2018, or other laws implementing the EU GDPR (collectively, the "GDPR") with respect to your Personal Data, as outlined below.

For this section, we use the terms "Personal Data" and "processing" as they are defined in the GDPR, but "Personal Data" generally means information that can be used to individually identify a person, and "processing" generally covers actions that can be performed in connection with data such as collection, use, storage and disclosure. Rootly will be the controller of your Personal Data processed in connection with the Services.

If there are any conflicts between this this section and any other provision of this Privacy Policy, the policy or 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 applies to you, please contact us at privacy@rootly.com. Note that we may also process Personal Data of our customers' end users or employees in connection with our provision of certain services to

customers, in which case we are the processor of Personal Data. If we are the processor of your Personal Data (i.e., not the controller), please contact the controller party in the first instance to address your rights with respect to such data.

Personal Data We Collect

The "Categories of Personal Data We Collect" section above details the Personal Data that we collect from you.

Personal Data Use and Processing Grounds

The "Our Commercial or Business Purposes for Collecting Personal Data" section above explains how we use your Personal Data.

We will only process your Personal Data if we have a lawful basis for doing so. Lawful bases for processing include consent, contractual necessity and our "legitimate interests" or the legitimate interest of others, as further described below.

- Contractual Necessity: We process the following categories of Personal Data as a matter of "contractual necessity", meaning that we need to process the data to perform under our Terms of Use with you, which enables us to provide you with the Services. When we process data due to contractual necessity, failure to provide such Personal Data will result in your inability to use some or all portions of the Services that require such data.
    - Contact Data
    - Profile Data
    - Payment Data
- Legitimate Interest: We process the following categories of Personal Data when we believe it furthers the legitimate interest of us or third parties:
    - Contact Data
    - Profile Data
    - Device/IP Data
    - Web Analytics
    - Geolocation Data
    - We may also de-identify or anonymize Personal Data to further our legitimate interests.

    Examples of these legitimate interests include (as described in more detail above):

    - Providing, customizing and improving the Services.
    - Marketing the Services.
    - Corresponding with you.
    - Meeting legal requirements and enforcing legal terms.
    - Completing corporate transactions.
- Consent: In some cases, we process Personal Data based on the consent you expressly grant to us at the time we collect such data. When we process Personal Data based on your consent, it will be expressly indicated to you at the point and time of collection.

- Other Processing Grounds: From time to time we may also need to process Personal Data to comply with a legal obligation, if it is necessary to protect the vital interests of you or other data subjects, or if it is necessary for a task carried out in the public interest.

Disclosing Personal Data

The "How We Disclose Your Personal Data" section above details how we disclose your Personal Data with third parties.

European Data Subject Rights

You have certain rights with respect to your Personal Data, including those set forth below. For more information about these rights, or to submit a request, please email us at privacy@rootly.com. Please note that in some circumstances, we may not be able to fully comply with your request, such as if it is frivolous or extremely impractical, if it jeopardizes the rights of others, or if it is not required by law, but in those circumstances, we will still respond to notify you of such a decision. In some cases, we may also need you to provide us with additional information, which may include Personal Data, if necessary to verify your identity and the nature of your request.

- **Access:** You can request more information about the Personal Data we hold about you and request a copy of such Personal Data. You can also access certain of your Personal Data by logging on to your account.
- **Rectification:** If you believe that any Personal Data we are holding about you is incorrect or incomplete, you can request that we correct or supplement such data. You can also correct some of this information directly by logging on to your account.
- **Erasure:** You can request that we erase some or all of your Personal Data from our systems.
- **Withdrawal of Consent:** If we are processing your Personal Data based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any time. Please note, however, that if you exercise this right, you may have to then provide express consent on a case-by-case basis for the use or disclosure of certain of your Personal Data, if such use or disclosure is necessary to enable you to utilize some or all of our Services.
- **Portability:** You can ask for a copy of your Personal Data in a machine-readable format. You can also request that we transmit the data to another controller where technically feasible.
- Objection: **You can contact us to let us know that you object to the further use or disclosure** of your Personal Data for certain purposes, such as for direct marketing purposes.
- **Restriction of Processing:** You can ask us to restrict further processing of your Personal Data.
- **Right to File Complaint:** You have the right to lodge a complaint about Rootly 's practices with respect to your Personal Data with the supervisory authority of your country or EU Member State. A list of Supervisory Authorities is available here: https://edpb.europa.eu/about-edpb/board/members_en.

Transfers of Personal Data

The Services are hosted and operated in the United States ("U.S.") through Rootly and its service providers, and if you do not reside in the U.S., laws in the U.S. may differ from the laws where you reside. By using the Services, you acknowledge that any Personal Data about you, regardless of whether provided by you or obtained from a third party, is being provided to Rootly in the U.S. and will be hosted on U.S. servers, and you authorize Rootly to transfer, store and process your information to and in the U.S., and possibly other countries. If we participate in international transfers of your data to the U.S. or similar country, such transfers will be made pursuant to a data processing agreement incorporating standard data protection clauses promulgated by the European Commission, a copy of which can be obtained at Kingdom Information Commissioner Office, or similar enforcement body in accordance with the GDPR.

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 Rootly 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:

- +1 (415)-812-1144
- https://rootly.com
- privacy@rootly.com
- 1390 Market Street. #2126 San Francisco, CA 94102 USA

EU Representative

Our representative in the European Union is DEEL IRELAND EOR LIMITED. You may contact our representative at:

DEEL IRELAND EOR LIMITED
Clonminch Hi-Technology Park,
Clonminch, Tullamore,
OFFALY, IRELAND R35 A2Y4

UK Representative

Our representative in the United Kingdom is DEEL IRELAND EOR LIMITED. You may contact our representative at:

LETS DEEL LIMITED
Prodware House,
Waterfold Park Prodware Uk Ltd,
Bury, England, BL9 7BR