

PRIVACY NOTICE

Last Updated December 13, 2024

This privacy notice ("Privacy Notice") for Licensing, Inc. DBA Reasoner ("Company," "we," "us," or "our"), describes how and why we might collect, store, use, and/or share ("process") your information when you use our Services. This Privacy Notice is incorporated into and forms part of Company's Terms of Use ("Terms"), and incorporates the definitions therein. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at legal@reasoner.com.

As we release services and features, this Privacy Notice may be updated per the provisions below.

TABLE OF CONTENTS

1. INFORMATION WE COLLECT
2. HOW WE PROCESS YOUR INFORMATION
3. LEGAL BASES FOR PROCESSING PERSONAL INFORMATION
4. HOW WE SHARE YOUR PERSONAL INFORMATION
5. THIRD-PARTY WEBSITES AND APPLICATIONS
6. COOKIES AND OTHER TRACKING TECHNOLOGIES
7. SOCIAL LOGINS
8. INTERNATIONAL TRANSFERS
9. STORING PERSONAL DATA
10. SECURITY
11. MINORS PROHIBITED
12. SPECIFIC AND INTERNATIONAL PRIVACY RIGHTS
13. CONTROLS FOR DO-NOT-TRACK FEATURES
14. PRIVACY NOTICE FOR CALIFORNIA RESIDENTS
15. PRIVACY NOTICE FOR VIRGINIA RESIDENTS
16. UPDATES TO THIS NOTICE
17. CONTACTING US ABOUT THIS NOTICE
18. HOW TO REVIEW, UPDATE, OR DELETE YOUR DATA

1. INFORMATION WE COLLECT

Personal information you disclose to us:

We collect personal information that you voluntarily provide to us when you express an interest in obtaining information about us or our products and Services, when you use the Services, or otherwise when you contact us.

Personal Information Provided by You. The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

Email address: when you register or sign up for information regarding our products, services, company or related offers, when you register for an account to consider, use or beta test our Services.

Physical address and phone number: when you register for an account to consider, use, beta test our Services.

Billing and payment information: when you use or beta test our Services.

Third party login information: when you register using a third party credential such as Google or Microsoft sign-on services.

Automatically collected information: Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our Services. We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

Cookie information and disclosures: We collect information through cookies and similar technologies, for site maintenance, security, product development, marketing and analytics purposes. Presently, cookies and tags used on our site include:

Google Analytics. [Google Privacy Policy](#). You can opt out via your [Google Privacy Settings](#) or via this [opt-out link](#).

Single Sign On authentication and session cookies for Microsoft or Google SSO.

First party cookies for the purposes noted above.

We do not process sensitive information, and You may not submit sensitive information to us using the Services.

All personal information and payment information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

The information we collect includes:

Log and Usage Data. Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings and information about your activity in the Services (such as login sessions, the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called “crash dumps”), and hardware settings).

Device Data. We collect device data such as information about your computer, phone, tablet, or other device you use to access the Services. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.

Location Data. We may collect location data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the Services. For example, we may obtain coarse location information based on your IP address or other network data. You can opt out of allowing us to collect this information using various means, such as by refusing access to the information, masking your IP address, or by disabling your Location setting on your device. However, if you choose to opt out, you may not be able to use certain aspects of the Services.

In order to enhance our ability to provide relevant marketing, offers, and services to you and update our records, we may obtain information about you from other sources, such as public databases, joint marketing partners, affiliate programs, data providers, social media platforms, and from other third parties. This information includes mailing addresses, job titles, email addresses, phone numbers, intent data (or user behavior data), Internet Protocol (IP) addresses, social media profiles, social media URLs, and custom profiles, for purposes of targeted advertising and event promotion. If you interact with us on a social media platform using your social media account (e.g., Facebook or Twitter), we receive personal information about you such as your name, email address, and gender. Any personal information that

we collect from your social media account depends on your social media account's privacy settings.

In order to provide payment services, we collect information about you including your name, email address, physical address and phone number, and share this with our payment vendors to fulfill our contractual agreements with you.

In order to provide login via third party log-in services, including Google and Microsoft Single Sign-on, we may receive certain information from those third parties, including your name, email address, and an authorization token. Your third party log-in can be revoked by you via your preferences with those service providers or by closing your account with us.

2. HOW WE PROCESS YOUR INFORMATION

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

- To facilitate account creation and authentication and otherwise manage user accounts. We may process your information so you can create and log in to your account, as well as keep your account in working order.
- To deliver and facilitate delivery of services to the user. We may process your information to provide you with the requested service.
- To respond to user inquiries/offer support to users. We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.
- To send administrative information to you. We may process your information to send you details about our products and services, changes to our terms and policies, and other similar information.
- To fulfill and manage your orders. We may process your information to fulfill and manage your orders, payments, reports, and usage of and made through the Services.
- To request feedback. We may process your information when necessary to request feedback and to contact you about your use of our Services.
- To send you marketing and promotional communications. We may process the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. You can opt out of our marketing emails at any time. For more information, see

“SPECIFIC AND INTERNATIONAL PRIVACY RIGHTS” below.

- To protect our Services. We may process your information as part of our efforts to keep our Services safe and secure, including fraud monitoring and prevention.
- To identify usage trends. We may process information about how you use our Services to better understand how they are being used so we can improve them.
- To determine the effectiveness of our marketing and promotional campaigns. We may process your information to better understand how to provide marketing and promotional campaigns that are most relevant to you.
- To save or protect an individual's vital interest. We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.

3. LEGAL BASES FOR PROCESSING PERSONAL INFORMATION

We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e., legal basis) to do so under applicable law, like with your consent, based on a legitimate interest, to comply with laws, to provide you with services to enter into or fulfill our contractual obligations, to protect your rights, or to fulfill our legitimate business interests.

If you are located in the EU or UK, this section applies to you.

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

- Consent. We may process your information if you have given us permission (i.e., consent) to use your personal information for a specific purpose. You can withdraw your consent at any time.
- Support our marketing activities to you and others. To the extent we do so in the future, develop and display personalized and relevant advertising content for our users.
- Performance of a Contract. We may process your personal information when we believe it is necessary to fulfill our contractual obligations to you, including providing our Services or at your request prior to entering into a contract with you, including:

- Provide and support the Services as reasonably related to fulfilling our Agreement with you.
- Legitimate Interests. We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. For example, we may process your personal information for some of the purposes described in order to:
 - Send users information about special offers and discounts on our products and services
 - Analyze how our services are used so we can improve them to engage and retain users
 - Diagnose problems and/or prevent fraudulent activities
 - Understand how our users use our products and services so we can improve user experience
- Legal Obligations. We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.
- Vital Interests. We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

In legal terms, we are generally the “data controller” under European data protection laws of the personal information described in this privacy notice, since we determine the means and/or purposes of the data processing we perform. This privacy notice does not apply to the personal information we process as a “data processor” on behalf of our customers. In those situations, the customer that we provide services to and with whom we have entered into a data processing agreement is the “data controller” responsible for your personal information, and we merely process your information on their behalf in accordance with your instructions. If you want to know more about our customers’ privacy practices, you should read their privacy policies and direct any questions you have to them.

If you are located in Canada, this section applies to you.

We may process your information if you have given us specific permission (i.e., express consent) to use your personal information for a specific purpose, or in situations where your

permission can be inferred (i.e., implied consent). You can withdraw your consent at any time.

In some exceptional cases, we may be legally permitted under applicable law to process your information without your consent, including, for example:

- If collection is clearly in the interests of an individual and consent cannot be obtained in a timely way.
- For investigations and fraud detection and prevention
- For business transactions provided certain conditions are met
- If it is contained in a witness statement and the collection is necessary to assess, process, or settle an insurance claim
- For identifying injured, ill, or deceased persons and communicating with next of kin
- If we have reasonable grounds to believe an individual has been, is, or may be victim of financial abuse
- If it is reasonable to expect collection and use with consent would compromise the availability or the accuracy of the information and the collection is reasonable for purposes related to investigating a breach of an agreement or a contravention of the laws of Canada or a province
- If disclosure is required to comply with a subpoena, warrant, court order, or rules of the court relating to the production of records
- If it was produced by an individual in the course of their employment, business, or profession and the collection is consistent with the purposes for which the information was produced
- If the collection is solely for journalistic, artistic, or literary purposes
- If the information is publicly available and is specified by the regulations

4. HOW WE SHARE PERSONAL INFORMATION

We may share information in specific situations described in this section and/or with the following categories of third parties.

Vendors, Consultants, and Other Third-Party Service Providers. We may share your data with third-party vendors, service providers, contractors, or agents ("third parties") who perform services for us or on our behalf and require access to such information to do that work. We have contracts in place with our third parties, which are designed to help safeguard your personal information. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will also not share your personal information with any organization apart from us. They also commit to protect the data they hold on our behalf and to retain it for the period we instruct. The categories of third parties we may share personal information with are as follows:

- Affiliate and Email Services or Marketing Programs
- Cloud Computing Services
- Communication & Collaboration Tools
- Data Analytics Services
- Data Storage Service Providers
- Finance & Accounting Tools
- Government Entities
- Performance Monitoring Tools
- Product Engineering & Design Tools
- Sales & Marketing Tools
- Testing Tools
- User Account Registration & Authentication Services
- Website Hosting Service Providers

We also may need to share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honor this privacy notice. Affiliates include our parent company and any subsidiaries, joint venture partners, or other companies that we control or that are under common control with us.
- **Business Partners.** We may share your information with our business partners to offer you certain products, services, or promotions.

In particular, our major third party vendors who may receive your personal information include:

- Amazon (Amazon Web Services) – [Privacy Notice](#)

- Google Workspace – [Privacy Statement](#)
- Google Analytics – [GA Privacy](#) – [GA Opt-out](#)
- Google Single Sign-on – [SSO Privacy](#) – [Managing SSO for our services](#)
- Mailchimp (Email and marketing services) – [Privacy Policy](#)
- Microsoft (Single Sign-on) – [Privacy Statement](#) – [SSO Privacy](#) – [Manage SSO access](#)
- Digits (Payments) – [Privacy Statement](#)

5. THIRD-PARTY WEBSITES AND APPLICATIONS

To the full extent allowed by law, we are not responsible for the safety of any information that you share with third parties that we may link to or who advertise on our Services, but are not affiliated with, our Services.

The Services may link to third-party websites, online services, or mobile applications and/or contain advertisements from third parties that are not affiliated with us and which may link to other websites, services, or applications. Accordingly, we do not make any guarantee regarding any such third parties, and we will not be liable for any loss or damage caused by the use of such third-party websites, services, or applications. The inclusion of a link towards a third-party website, service, or application does not imply an endorsement by us. We cannot guarantee the safety and privacy of data you provide to any third parties. Any data collected by third parties is not covered by this privacy notice. We are not responsible for the content or privacy and security practices and policies of any third parties, including other websites, services, or applications that may be linked to or from the Services. You should review the policies of such third parties and contact them directly to respond to your questions.

6. COOKIES AND OTHER TRACKING TECHNOLOGIES

We use cookies and other tracking technologies to collect and store your information.

We use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in Section 1 above.

7. SOCIAL LOGINS

You can log in to use the Services via Google or Microsoft Single Sign-on.

We may receive and use your name, email address, and an authorization token to associate these with your account, provide the Services for the purposes and uses described in Section 2. You can revoke these credentials via the settings offered by Google or Microsoft, or by closing your account with us.

8. INTERNATIONAL TRANSFERS

We are located in the United States, and if you operate or live outside the U.S., we may transfer, store, and process your information in countries other than your own. Our servers are located in the United States. If you are accessing our Services from outside the United States, please be aware that your information may be transferred to, stored, and processed by us in our facilities and by those third parties with whom we may share your personal information (see "HOW WE SHARE YOUR PERSONAL INFORMATION" above), in the United States, and other countries.

If you are a resident in the European Economic Area (EEA) or United Kingdom (UK), then these countries may not necessarily have data protection laws or other similar laws as comprehensive as those in your country. However, we work to take measures to protect your personal information in accordance with this privacy notice and applicable law. To protect our personal information, we may use measures such as the European Commission's Standard Contractual Clauses.

For additional information, see the following parts of this Privacy Notice:

INFORMATION WE COLLECT To learn more about the types of personal data Company collects.

HOW WE PROCESS YOUR INFORMATION To learn more about the purposes for which Company collects and uses personal information about you.

HOW WE SHARE YOUR PERSONAL INFORMATION To learn more about the type or identity of third parties to which Company discloses personal information, and the purposes for which we do so.

SPECIFIC AND INTERNATIONAL PRIVACY RIGHTS To learn more about the right of individuals to access their personal data.

9. STORING PERSONAL DATA

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than five years, or a shorter period if required by law.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such

information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

10. SECURITY

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

11. MINORS PROHIBITED

Our Services are not available to users below 18 years of age, are not intended for users below 18 years of age, and we do not knowingly collect data from or market to children under 18 years of age.

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at legal@reasoner.com.

12. SPECIFIC AND INTERNATIONAL PRIVACY RIGHTS

In some regions (like the EEA, UK, and Canada), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us by using the contact details provided in the section "CONTACTING US ABOUT THIS NOTICE" below.

We will consider and act upon any request in accordance with applicable data protection laws.

If you are located in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: https://edpb.europa.eu/about-edpb/about-edpb/members_en.

If you are located in Switzerland, the contact details for the data protection authorities are available here: <https://www.edoeb.admin.ch/edoeb/en/home.html>.

Withdrawing your consent: If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section "CONTACTING US ABOUT THIS NOTICE" below or updating your preferences.

However, please note that this will not affect the lawfulness of the processing before its withdrawal, nor when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

Opting out of marketing and promotional communications: You can unsubscribe from our marketing and promotional communications at any time by clicking on the unsubscribe link in the emails that we send, replying "STOP" or "UNSUBSCRIBE" to the SMS messages that we send, or by contacting us using the details provided in the section "CONTACTING US ABOUT THIS NOTICE" below. You will then be removed from the marketing lists, although removal may take up to two weeks, and we may still communicate with you, for example to send you service-related messages that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes.

Account Information

If we offer accounts, and you would at any time like to review or change the information in your account or terminate your account, you can:

Contact us using the contact information provided or, if accounts are offered, via account settings.

Upon your request to terminate your account, we will deactivate or delete your account. Email address and/or information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any

investigations, enforce our legal terms and/or comply with applicable legal requirements.

Cookies and similar technologies: Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services. To opt out of interest-based advertising by advertisers on our Services visit <http://www.aboutads.info/choices/>. For further information, please see Section 1 above.

If you have questions or comments about your privacy rights, you may email us at legal@reasoner.com.

13. DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") or Global Privacy Controls ("GPC") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. As standards for response to these features mature and we implement our services, we will inform you about that practice in this privacy notice.

14. PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with Services, you have the right to request removal of unwanted data that you publicly post on the Services. To request removal of such data, please contact us using the contact information provided below and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Services, but please be aware that the data may not be completely or comprehensively removed from all our systems (e.g., backups, etc.).

CCPA Privacy Notice

The California Code of Regulations defines a "resident" as:

- (1) every individual who is in the State of California for other than a temporary or transitory purpose and;
- (2) every individual who is domiciled in the State of California who is outside the State of California for a temporary or transitory purpose

All other individuals are defined as "non-residents."

If this definition of "resident" applies to you, we must adhere to certain rights and obligations regarding your personal information.

What categories of personal information do we collect?

We have collected the following categories of personal information in the past twelve (12) months:

Category	Description	Collected & time period kept
A. Identifiers	Contact details, such as real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address, and account name.	YES Up to 5 years
B. Personal information per California Customer Records Statute	Name in combination with statutory categories of contact information, education, employment, employment history, and financial information	YES
C. Protected classification under California or Federal law	Gender, date of birth	NO
D. Commercial information	Transaction information, purchase history, financial details, and payment information	YES Up to 7 years or as required by applicable tax laws.

E. Biometric information	Fingerprints, voiceprints, eye prints, or facial recognition	NO
F. Internet or other similar network activity	Browsing history, search history, online behavior, interest data, and interactions with our and other websites, applications, systems, and advertisements	YES Up to 5 years
G. Geolocation data	Device location	YES Up to 5 years
H. Audio, electronic, visual, thermal, olfactory, or similar information	Images and audio, video or call recordings created in connection with our business activities	NO
I. Professional or employment-related information	Business contact details in order to provide you our services at a business level or job title, work history, and professional qualifications if you apply for a job with us	YES Up to 7 years after employment
J. Education information	Student records and directory information	NO
K. Inferences drawn from other personal information	Inferences drawn from any of the collected personal information listed above to create a profile or summary about, for example, an individual's preferences and characteristics	NO
L. Sensitive personal information	Account login information, drivers' licenses, health data, precise geolocation, racial or ethnic origin, religious or philosophical	NO

	beliefs, and sex life or sexual orientation	
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We may also collect other personal information outside of these categories instances where you interact with us in person, online, or by phone or mail in the context of:

- Receiving help through our customer support channels;
- Participation in customer surveys or contests; and
- Facilitation in the delivery of our Services, beta tests, and to respond to your inquiries.

How do we use and share your personal information?

The Company collects and shares your personal information through:

- First party cookies
- Analytics, targeting and/or marketing cookies
- Beacons, Pixels, or Tags

More information about our data collection and sharing practices can be found in this privacy notice in Section 1 above.

You may contact us by email at legal@reasoner.com, or by referring to the contact details at the bottom of this document.

If you are using an authorized agent to exercise your right to opt out we may deny a request if the authorized agent does not submit proof that they have been validly authorized to act on your behalf.

Will your information be shared with anyone else?

We may disclose your personal information with our service providers pursuant to a written contract between us and each service provider. Each service provider is a for-profit entity that processes the information on our behalf, following the same strict privacy protection obligations mandated by the CCPA.

We may use your personal information for our own business purposes, such as for undertaking internal research for technological development and demonstration. This is not considered to be "selling" of your personal information.

Reasoner has not sold or shared any personal information to third parties for a business or commercial purpose in the preceding twelve (12) months.

Your rights with respect to your personal data

Right to request deletion of the data — Request to delete

- You can ask for the deletion of your personal information. If you ask us to delete your personal information, we will respect your request and delete your personal information, subject to certain exceptions provided by law, such as (but not limited to) the exercise by another consumer of his or her right to free speech, our compliance requirements resulting from a legal obligation, or any processing that may be required to protect against illegal activities.

Right to be informed — Request to know

Depending on the circumstances, you have a right to know:

- whether we collect and use your personal information;
- the categories of personal information that we collect;
- the purposes for which the collected personal information is used;
- whether we sell or share personal information to third parties;
- the categories of personal information that we sold, shared, or disclosed for a business purpose;
- the categories of third parties to whom the personal information was sold, shared, or disclosed for a business purpose;
- the business or commercial purpose for collecting, sharing, or selling personal information; and
- the specific pieces of personal information we collected about you.
- In accordance with applicable law, we are not obligated to provide or delete consumer
- information that is de-identified in response to a consumer request or to re-identify individual data to verify a consumer request.

Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights:

- We will not discriminate against you if you exercise your privacy rights.

Right to Limit Use and Disclosure of Sensitive Personal Information:

- We do not process consumer's sensitive personal information.

Verification process:

- Upon receiving your request, we will need to verify your identity to determine you are the same person about whom we have the information in our system. These verification efforts require us to ask you to provide information so that we can match it with information you have previously provided us. For instance, depending on the type of request you submit, we may ask you to provide certain information so that we can match the information you provide with the information we already have on file, or we may contact you through a communication method (e.g., phone or email) that you have previously provided to us. We may also use other verification methods as the circumstances dictate.

- We will only use personal information provided in your request to verify your identity or authority to make the request. To the extent possible, we will avoid requesting additional information from you for the purposes of verification. However, if we cannot verify your identity from the information already maintained by us, we may request that you provide additional information for the purposes of verifying your identity and for security or fraud-prevention purposes. We will delete such additionally provided information as soon as we finish verifying you.

Other privacy rights:

- You may object to the processing of your personal information.
- You may request correction of your personal data if it is incorrect or no longer relevant, or ask to restrict the processing of the information.
- You can designate an authorized agent to make a request under the CCPA on your behalf. We may deny a request from an authorized agent that does not submit proof that they have been validly authorized to act on your behalf in accordance with the CCPA.

15. PRIVACY NOTICE FOR VIRGINIA RESIDENTS

If you are a resident of Virginia, you may be granted specific rights regarding access to and use of your personal information.

Virginia CDPA Privacy Notice

Under the Virginia Consumer Data Protection Act (CDPA):

- "Consumer" means a natural person who is a resident of the Commonwealth acting only in an individual or household context. It does not include a natural person acting in a commercial or employment context.

- “Personal data” means any information that is linked or reasonably linkable to an identified or identifiable natural person. “Personal data” does not include de-identified data or publicly available information.
- “Sale of personal data” means the exchange of personal data for monetary consideration.
- If this definition of “consumer” applies to you, we must adhere to certain rights and obligations regarding your personal data.
- The information we collect, use, and disclose about you will vary depending on how you interact with Company and our Services. To find out more, please visit the following sections above:
 - 1. INFORMATION WE COLLECT
 - 2. HOW WE PROCESS YOUR INFORMATION
 - 4. HOW WE SHARE YOUR PERSONAL INFORMATION

Your rights with respect to your personal data

- Right to be informed whether or not we are processing your personal data
- Right to access your personal data
- Right to correct inaccuracies in your personal data
- Right to request deletion of your personal data
- Right to obtain a copy of the personal data you previously shared with us
- Right to opt out of the processing of your personal data if it is used for targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects ([“profiling”/“profiling”])

Company has not sold any personal data to third parties for business or commercial purposes as defined under Virginia law.

Exercise your rights provided under the Virginia CDPA

More information about our data collection and sharing practices can be found in this privacy notice in Section 1 above.

You may contact us by email at legal@reasoner.com or by referring to the contact details at the bottom of this document.

If you are using an authorized agent to exercise your rights, we may deny a request if the authorized agent does not submit proof that they have been validly authorized to act on your behalf.

Verification process

We may request that you provide additional information reasonably necessary to verify you and your consumer's request. If you submit the request through an authorized agent, we may need to collect additional information to verify your identity before processing your request.

Upon receiving your request, we will respond without undue delay, but in all cases, within forty-five (45) days of receipt. The response period may be extended once by forty-five (45) additional days when reasonably necessary. We will inform you of any such extension within the initial 45-day response period, together with the reason for the extension.

Right to appeal

If we decline to take action regarding your request, we will inform you of our decision and reasoning behind it. If you wish to appeal our decision, please email us at legal@reasoner.com. Within sixty (60) days of receipt of an appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If your appeal is denied, you may contact the Attorney General to submit a complaint.

16. UPDATES TO THIS NOTICE

We may update this privacy notice from time to time, such as upon beta tests, product launches, feature updates, business changes, or changes in applicable laws and regulations. The updated version will be indicated by an updated “Revised” date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

This Privacy Notice in part uses, and is substantially modified in form from, a Privacy Notice template provided by Termly.

17. CONTACTING US ABOUT THIS NOTICE

If you have questions or comments about this notice, you may contact us via email at legal@reasoner.com, or by mail at:

LICENSING, INC D/B/A Reasoner

177 Huntington Ave #1700 PMB 91559
Boston, MA 02115

18. HOW TO REVIEW, UPDATE, OR DELETE YOUR DATA

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it in some circumstances. To request to review, update, or delete your personal information, please contact us at legal@reasoner.com.