

PRIVACY POLICY FOR ORTHODOX.AI INC.

Effective: October 15, 2019

Welcome to orthodox.ai (“we”, “us”, “our”, or simply “**orthodox**”). Our job is to make it quick and easy to organize, and make sense of, executed documents. This privacy policy (“**Privacy Policy**”) applies to the information collection and use practices of our software and services made available to you through our online platform, accessed at www.orthodox.ai (the “**Site**”). The Site has been created to provide information about us, and to provide our software and services (“**Services**”) for each company, partnership, organization, individual, or other type of entity (each, a “**User**”) that holds an orthodox account.

For an organizational User, such as a company, partnership, or other type of organizational entity (each, an “**Organization**”), the Services enable the uploading, categorizing, tagging, and organizing of documents, official records, data, and other information related to the organizational User’s business (collectively, “**User Data**”). User Data relating to the Organization might include, for example without limitation, the content of incorporation documents, board or stockholder actions, capitalization tables, financing documentation, employment agreements, sales contracts, tax filings, patents, and vendor agreements.

This Privacy Statement sets forth orthodox’s policy with respect to information, including information that identifies you personally (“**Personally Identifiable Information**” or “**PII**”), that is collected from individuals when they visit the Site or use our Services, or that may otherwise be collected and included in the User Data of an Organization. We will not use or disclose your PII except as described in this Privacy Policy or when orthodox otherwise has your authorization to do so.

If you do not agree with the data practices described in this Privacy Policy, or you do not want your PII or other information processed by orthodox as described in this Privacy Policy, do not use or access (or continue to use or access) the Services or the Site. If the Organization continues to use the Services or the Site after you have decided not to use the Services or the Site, contact the Organization to further understand the consequences of your decision.

Capitalized terms not defined in this Privacy Policy will have the meaning set forth in our [Terms of Service](#). By visiting and/or using our Services, you are agreeing to the terms of this Privacy Policy and the accompanying Terms of Use. We encourage you to read the Privacy Policy and to use the information it contains to help you make informed decisions.

1. INFORMATION WE COLLECT OR RECEIVE

Personally Identifiable Information

We collect PII when you provide it to us voluntarily, or when it is provided to us by the Organization in connection with the Organization’s use of the Services. For example, we may collect your first and last name, postal address, birth date, email address, phone number, credit card or other billing information (including Payment Information as defined below), marital status, social security, passport or other identification number, IP address, photo, signature, and information relating to your relationship with the Organization, which may include employee data, banking and financial account information, and/or taxpayer data. We only request or obtain PII when it is required to provide the Services or otherwise complies with this Privacy Policy.

Payment Information

If you subscribe to our paid Services, you will be required to provide us with your payment information, including, without limitation, bank account numbers, credit card or debit card numbers, account details, ACH information, and similar data (collectively, "Payment Information"). Such Payment Information will be collected and processed by our third-party payment vendors pursuant to the terms and conditions of their privacy policies and terms of use, and we do not obtain access to any Payment Information in connection with such purchases or subscriptions.

Usage Information

In addition to your PII and Payment Information, we may automatically collect or receive additional information regarding you or your usage of the Services; your interactions with us via our advertising on third-party websites and mobile applications; and information regarding your computer and mobile devices used to access the Services (collectively, "Usage Information"). Such Usage Information may include: additional information about yourself that you voluntarily provide to us, such as your occupation and your product and service preferences; your IP address, which may consist of a static or dynamic IP address and will sometimes point to a specific identifiable computer or mobile device; browser type and language; referring and exit pages and URLs; date and time; and details regarding your activity on the Services, such as search queries and other performance and usage data; and, if you access the Services using a mobile device, information regarding type of mobile device, operating system and version (e.g., iOS, Android or Windows); carrier; and network type (WiFi, 3G, 4G, LTE).

Usage Information may be shared with the Organization and its representatives. We may also collect additional data used in aggregate and without PII about the type of browser you are using, the device on which it is being used, where you are located, and the language set in your device.

User Data

It is a core function of orthodox to collect, process, organize, and safeguard User Data. User Data refers to the content of documents, official records, and other information related to a User's business. For example, User Data includes without limitation the content of an Organization's incorporation documents, board or stockholder actions, capitalization tables, financing documentation, employment agreements, sales contracts, tax filings, patents, and vendor agreements. User Data of an Organization with which you are associated, in addition to any User Data of yours as an individual User, may contain your PII.

Cookies

Like many online services, orthodox requires the use of cookies while you are using our Site for the legitimate interest of delivering and optimizing our Services. We may use both session cookies, which expire once you close or exit the Services, and persistent cookies, which stay on your device until you delete them and other technologies to help us collect data and to enhance your experience with the Services. Cookies are small text files used to recognize a repeat visitor to the Services. We may use cookies for various purposes, including to: recognize you as a user; verify your identity when you have logged into the Services; assist us in providing user support; identify the type of mobile device (if applicable); personalize your experience; analyze which portions of the Services are visited and used most frequently; and measure and optimize advertising and promotional effectiveness in connection with our advertising on third-party websites and mobile applications.

You can block or disable cookies by activating the setting on your browser that allows you to refuse the settings of all or some cookies. However, if you use your browser settings to block

cookies (including essential cookies that are required for the operation of our Site and Services), this may adversely impact your ability to use or access our Site or Services. We do not currently recognize or respond to browser-initiated "do not track" signals as there is no consistent industry standard for compliance.

Your Contacts

You may choose to give us access to your contacts to make it easy for you to do things like share and collaborate on documents, send messages, and invite others to use the Services. If you do, we'll store those contacts on our servers for you to use.

Third-Party Log In

If you sign in using your Google G Suite or Gmail account (in either case, a "Google Account"), you are authorizing us to collect, store, and use, in accordance with this Privacy Policy, any and all information that you agreed that your Google Account would provide to us through Google's application programming interface ("API"). Such information may include, without limitation, your first and last name, your Google Account username, profile picture, headline, unique identifier and access token, and e-mail address.

2. HOW INFORMATION IS USED

Except as described below under Section 4 of this Privacy Policy, orthodox will never sell, share, or rent your Information to a third party. We process PII and other Information (as defined below) for legitimate business purposes in connection with our Services with the principle objective of delivering an enhanced user experience.

Information Used to Deliver Our Services

We use your PII, Payment Information, Usage Information, and User Data (collectively, the "**Information**") in the course of delivering our Services to the Organization and/or to you as an individual User, to provide user support, to maintain information security, and to fulfill our obligations and enforce our rights, such as billing and collection, that arise from any agreements with you and/or the Organization.

In the event of a credit card dispute, we also share account information with your bank to verify the legitimacy of a charge. We may also contact you to inform you about changes in our services, our service offering and other important service-related notices, including security related notices. Your PII may form part of your Organization's User Data, and you should consult with the Organization on its use of your PII.

Automated Information Processing

The content of your Information and User Data may be read, interpreted, tagged, and categorized by automated information processing technologies ("**AI**") to deliver the Services. For example, when an Organization uploads a corporate document to the Services, that document may be tagged based on its content by automated information processing technologies for the purpose of delivering the Services.

Manual Information Processing

In addition to using AI, we may employ certain trusted third parties and individuals (for example and without limitation, individual providers of administrative or technology services,

customer service and support, IT services, and other service providers) to help us provide, expedite, monitor, improve, protect, and promote our Services. For example, when an Organization uploads a corporate document to the Services, that document may be read, interpreted, tagged and categorized by a human being employed or otherwise engaged by orthodox. The Services accordingly may make available your Information and User Data to these trusted third parties and individuals, who include our employees, contractors, consultants, and other agents, for the purpose of delivering or improving our Services. Please read Section 4 of this Privacy Policy for further information about when your Information may be disclosed.

Payments and Billing

We will use your Payment Information to process your authorized payments. We will share your Payment Information with a third-party service provider as necessary to process your payment. The third-party service provider stores your Payment Information; we do not store this information. Storage by the third-party service provider of your Payment Information is subject to the privacy policies and practices of the third-party service provider and is not subject to the terms of this Privacy Policy. By providing your Payment Information, you acknowledge and agree to use of such information by the third-party service provider for purposes of processing your payment to us.

Promotional or Marketing

We may use your PII to contact you to explain additional services or features that we offer that are compatible with your current use of or interest in the Services based on pages you've visited, to send you our newsletter or blog articles, to send other emails or surveys to gather information to better serve you and our customer Organizations, and to evaluate the performance of our marketing efforts. You have the right to object to the use of your PII for promotional or marketing purposes and you can contact us at legal@orthodox.ai to do so. Also, if you do not want to receive promotional or marketing communications from us, you can follow the unsubscribe instructions included in any of those emails that you receive from us.

Analytics

As part of our ongoing effort to educate our users and improve our service, orthodox produces analytics that are used internally and/or are reported to our customer Organizations and other users of our Services, and could be used to assist in their decision-making processes. Data used for purposes of such analytics is collected from the use of the Site and Services by our users and analyzed in the aggregate and on a de-identified basis. We may use or disclose such aggregate and de-identified analytics without restriction, including using them for marketing purposes.

User Experience Improvements

We are constantly striving to improve the Services, and develop new products and features. As such, orthodox may collect information about users' experience with the Services. We use server logs, crash reports, cookies, web beacons, and similar tools to collect usage data. This usage data may be analyzed in various ways, including allowing us to determine the areas of the Service's web application that are visited more often or for a longer period of time, or reporting bugs and troubleshooting product functionality, so that we can optimize our Services.

3. HOW YOUR INFORMATION IS PROTECTED

Security

We take commercially reasonable steps to protect the Information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. Please understand, however, that no security system is impenetrable. We cannot guarantee the security of our databases or the databases of the third parties with which we may share such Information, nor can we guarantee that the Information you supply will not be intercepted while being transmitted over the Internet. In particular, e-mail sent to us may not be secure, and you should therefore take special care in deciding what information you send to us via e-mail.

Hosting

As of the date of this Privacy Policy, our servers are hosted with Amazon Web Services in multiple US regions.

Data Retention

Your Information, including PII, will be used by orthodox for the duration of your relationship with any Organization, and for the duration of the applicable Organization's use of the Services, and for the duration of your use of the Services if you are an individual User, or as necessary to comply with our legal obligations, to resolve disputes, and to enforce our agreements.

Removal of PII

If you wish to permanently delete your PII from orthodox, contact us at legal@orthodox.ai and also contact any Organization with which you are associated. Once your removal request has been verified by orthodox, we will make reasonable commercial efforts to remove your PII from our Service, but backups may persist for a reasonable period of time thereafter. Regardless of the removal of PII from the Services, any Organization associated with you will likely still have some of your PII in its account on the orthodox platform because of documentation or information you completed and/or submitted to the Organization in the course of your relationship with the Organization, and this data will remain in the relevant Organization's account as long as it has an orthodox account.

4. WHEN YOUR INFORMATION MAY BE DISCLOSED

Organizations; Organizational Users

Designated administrators and other authorized users at the Organization have full access to your Information and User Data as it relates to such Organization. In addition, the designated administrators at the Organization control and determine (a) who has access rights to your Information and User Data within the Services, (b) when your Information or User Data is shared with another individual or entity, and (c) when your Information or User Data may be included on a report generated within the Services. We suggest that you inquire with the Organization to learn about your privacy rights within that Organization, and to better understand the details of their human resource policies and information security protocols.

When you register your orthodox account with an email address on a domain owned by your employer or your Organization, we may help collaborators and other organizational users find you by making some of your basic information—like your name, company or organizational name, profile picture, and email address—visible to other users on the same domain. This helps you sync up with teams you can join and helps other users share documents and document-tagging taxonomies with you.

If you are not an orthodox organizational user but interact with an orthodox organizational user (by, for example, joining a shared document space, or accessing things shared by that user), members of the applicable Organization may be able to view the name, email address, profile picture, and IP address that was associated with your account at the time of that interaction.

Other Users

You can share your Information and your User Data with other users if you choose. Also, certain features of the Services let you make additional information available to others. You may also give third-party providers access to your Information and account—for example, through APIs. Just remember that their use of your Information will be governed by their privacy policies and terms.

Employees and Contractors

We employ certain trusted third parties and individuals, including our employees, contractors, consultants, and other agents, to help us provide, expedite, monitor, improve, protect, and promote our Services. Our Services may make available your Information and User Data to these trusted third parties and individuals, for the purpose of delivering the Services. (See, for example, Manual Information Processing, above.)

Service Providers

We may disclose your Information and User Data to contractors and service providers that we engage to support our business in various ways such as by processing payments, assisting with user support and customer relationship management, supporting chat or internal instant messaging, or providing email, business applications, or cloud storage.

Law & Order

We will disclose your data when and as required by law or in the good-faith belief that such action is necessary to conform to the law or comply with a legal process served on us; Protect and defend the rights or property relating to our Site or Service or to visitors or other users of our Site or Service; Identify persons who may be violating the law or the rights of third parties; or Cooperate with investigations by relevant government authorities of purported unlawful activities.

Merger/Acquisition

If orthodox's ownership changes as a result of a sale, merger, reorganization, dissolution, or similar event, your Information may be transferred to a successor entity.

5. ACCESSING AND MODIFYING INFORMATION; COMMUNICATION PREFERENCES

You should contact the Organization if any of your Information contained in orthodox is not accurate, current and/or complete. You can also access and update certain of your PII within orthodox. If you have provided us any account information, you may access, remove, review, and/or make changes to the same by contacting us as set forth below. In addition, you may manage your receipt of marketing and non-transactional communications by clicking on the "unsubscribe" link located on the bottom of any of our marketing e-mails. We will use commercially reasonable efforts to process such requests in a timely manner. You should be aware, however, that it is not always possible to completely remove or modify information in

our subscription databases. You cannot opt out of receiving transactional e-mails related to the Services (e.g., requests for support).

6. IMPORTANT NOTICES TO NON-U.S. RESIDENTS

The Services and our servers are operated in the United States. If you are located outside of the United States, please be aware that your Information, including your Account Information, may be transferred to, processed, maintained, and used on computers, servers, and systems located outside of your state, province, country, or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. If you are located outside the United States and choose to use the Services, you hereby irrevocably and unconditionally consent to such transfer, processing, and use in the United States and elsewhere.

7. CHILDREN

The Services are not directed to children under the age of 13. We adhere to the Children's Online Privacy Protection Act (COPPA) and will not knowingly collect Account Information from any child under the age of 13. We ask that minors (under the age of 13) not use the Services. If a child under the age of 13 has provided us with Account Information, a parent or guardian of that child may contact us and request that such information be deleted from our records.

8. CALIFORNIA PRIVACY LAW: DO NOT TRACK

We do not monitor, recognize, or honor any opt-out or do not track mechanisms, including general web browser "Do Not Track" settings and/or signals.

9. CHANGES TO THIS PRIVACY POLICY

This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may change this Privacy Policy from time to time. Any such changes will be posted on the Client. By accessing the Client after we make any such changes to this Privacy Policy, you are deemed to have accepted such changes. Please be aware that, to the extent permitted by applicable law, our use of the Information is governed by the Privacy Policy in effect at the time we collect the Information. Please refer back to this Privacy Policy on a regular basis.

10. HOW TO CONTACT US

If you have questions about this Privacy Policy, please e-mail us at legal@orthodox.ai with "Privacy Policy" in the subject line or mail us at the following address: 3225 Ash Street, Palo Alto, California 94306.

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