

# PRIVACY POLICY

## SLED AND DOT

### (SNOWBOARD SOFTWARE GMBH)

This Notice explains how Snowboard Software GmbH. and its affiliates and subsidiaries operating under the 'Sled' or 'Dot' brand (“Sled”, “Dot”, “we”, “our” or “us”) collect, store, use, disclose and otherwise process information about you in the course of our business, including through our websites that link to this Notice (such as, [www.getdot.ai](http://www.getdot.ai), [www.sled.so](http://www.sled.so)) (the “Sites”), our SaaS data governance and SaaS chat agent services (the “Service”) and through other means such as our and our partner’s events, sales and marketing activities. It also sets out more information about your privacy rights.

#### **About Our Service**

We provide the Service to our customers under an agreement with them and solely for their benefit and the benefit of their personnel and other personnel authorized by them as users of the Service (“Authorized Users”). Our customers can efficiently store and analyze all their data in the Service. Because the Service is SaaS, Authorized Users may access and use the Service from all over the world, subject to Dot’s agreement with customers and any applicable laws. This Notice does not apply to the content that our customers and their Authorized Users upload and store in the Service (“Customer Content”). In those circumstances:

- (a) Dot is processing Customer Content on behalf of a customer and that customer is responsible for the collection and use of your data; and
- (b) that customer’s privacy notice will apply to the customer’s collection and use of such Customer Content.

In such circumstances you should refer to their privacy notice and direct any queries to them. The customer’s agreement with Dot governs our use of and processing of Customer Content in these circumstances. For more information about our data collection and use in connection with our Service see the “When using the Service” Sub-section of the Information We Automatically Collect Section below.

#### **1. Information You Provide**

The personal information we collect when you use the Sites, including when you sign up to the Service through our Sites self-service portal (“Self-Service”), and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your personal information. We will let you know prior to collection whether the provision of personal information we are collecting is compulsory or may be provided on a voluntary basis.

**When using the Sites:** We may collect your name, email, postal address, phone number and other information you provide via the Sites when, for example, you submit inquiries, request more information about our services, complete surveys or download Dot collateral, provide feedback about our services or register for sales events or marketing activities.

**When you register to use our Service:** When you register to use our Service, we may collect your personal information (like name and contact details), and for Self-Service we collect credit card information. We may share such credit card information with our third-party service providers, including for payment and billing purposes.

## **2. Information We Automatically Collect**

**When using the Sites:** We automatically collect certain information when you visit or use the Sites, including your use of Self-Service. This information may reveal your identity and may include information about the specific computer or device you are using, such as your computer's operating system and Internet Protocol (IP) address. We also automatically collect and store information about your activities on our Sites, such as information about how you came to and used our Sites, event information (like access times and browser type and language) and data collected through cookies and other similar technologies that uniquely identify your browser, computer and/or other device. We may disclose information about your computer or other device with our third-party service providers for information and network security, including fraud detection.

**When using the Service:** We automatically collect certain data relating to the performance and configuration of our Service and our Customers' and Authorized Users' consumption, use of, and interaction with the Service (collectively, "**Usage Data**"). While Usage Data usually does not involve personal information, it may include such data in the following instances:

- technical information, or data obtained from APIs, software or systems hosting the products and services and devices accessing these products and services, log files generated during such use;
- data and metadata about an Authorized Users, such as user ID, email, IP address, other data about the user's computer or other device, browser and connecting software (e.g., OS and software versions); and
- data and metadata about an Authorized Users' activities and behavior within our Service, such as click-patterns and feature utilization.

Usage Data is used by Dot for (a) providing, supporting and operating our products and services, (b) network and information security and (c) to analyze, develop and improve our products and services.

## **3. Information We Receive from Third Parties**

From time to time, we may obtain information about you from third party sources, such as public databases and websites, resellers and distributors, joint marketing or business partners, security and fraud detection firms and social media platforms. Examples of the information we may receive from other sources include: account information; page-view information; contact information from business partners with whom we operate co-branded events, services and marketing campaigns or joint offerings; search results and links, including paid listings (such as sponsored links); and credit history information from credit bureaus.

## **4. Third Party Applications**

We may link to certain third-party websites and applications in our Service, or on our Sites such as Facebook. In those circumstances, the data we collect, use and disclose via the Sites or the Service will be subject to this Privacy Notice, including our Cookie Statement. However, your use of the third-party websites, applications and any information you instruct us to send to the third-party will be subject solely to the third-party's terms and conditions and privacy notice, and will not be subject to any agreements you have with us or this Notice.

## **5. Targeted Online Advertisements**

We use one or more third party service providers to serve ads about our products and services on other websites. These third parties may automatically collect and use certain information about your online activities, either on our Sites or other websites, such as your IP address, your ISP and the browser you are using. They do this using cookies, clear gifs and similar tracking technologies. Information collected may be used, alone or in combination with information about you we obtain from other sources (like our data partners and offline customer data), to among other things, deliver advertising targeted to your interests, including serving ads related to our products or services when you access and use other websites and to better understand the usage of the Sites tracked by these third parties.

This Notice does not apply to, and we are not responsible for, cookies or clear gifs in ads delivered by third parties on other websites, and we encourage you to check the privacy policies of ad services to learn about their use of cookies and other technology.

## **6. Use of Information We Collect**

We use personal information collected via the Sites, our Service and through other means (e.g., in person) for purposes described in this Notice, including using your information to:

- operate, audit and improve our Sites, products and services;
- provide customer service and support;
- provide and to facilitate the delivery of products and services you request;
- send you related information, including confirmations, invoices, technical notices, updates, security alerts, training and support and administrative messages;
- maintain your account;
- enhance security, monitor and verify identity or service access, combat fraud, spam, malware or other network and/or information security risks;
- detect bugs, report errors and perform activities to maintain the quality or safety of our services;
- conduct research and development;
- understand you and your preferences to enhance and personalize your experience and enjoyment when using our Sites, products and services;
- develop and send you marketing, sales and promotional communications (where this is in accordance with your marketing preferences);
- communicate with you about one of our events or our partner events, including webinars and demos;
- respond to your comments or questions or provide information requested by you;
- link or combine it with other personal information we get from third parties, to help understand your needs, provide you with better service and to prevent fraud;

- process and deliver contest entries and rewards;
- display and measure engagement with advertisements across different devices and sites;
- maintain legal and regulatory compliance;
- short-term, transient use, such as customizing content that we or our service providers display on the services; and
- process your information for other legitimate business purposes, such as customer surveys, data analysis, audits, collecting and assessing feedback, identifying usage trends, determining the effectiveness of our marketing campaigns and to evaluate and improve our products, services, marketing and customer relationships.

We may store and process personal information in the United States and other countries.

## 7. Disclosure of Personal Information

We do not disclose your personal information with third parties other than as follows:

- where it has been de-identified, including through aggregation or anonymization;
- when you instruct us to do so;
- with your consent, for example, when you agree to our disclosing your information with other third parties for their own marketing purposes subject to their separate privacy policies;
- with Dot affiliates, in such case the information will be processed as otherwise described in this Notice;
- with third party vendors, consultants and other service providers who work for us and need access to your information to do that work. Examples include vendors and service providers who provide assistance with marketing, billing, processing credit card payments, data analysis, fraud prevention, network and information security, technical support and customer service;
- with third party business partners, such as distributors, and/or referral partners, who are involved in providing services to our prospects and/or customers, to fulfill product and information requests and to provide customers and prospective customers with information about Dot and its products and services. From time to time, we may engage in joint sales or product promotions with select business partners. If you purchase or specifically express an interest in a jointly-offered product, promotion or service, we may share relevant personal information with those partner(s). **Where you have given your consent to do so, these business partners may send you marketing communications about their own products and services.** Please be aware that we do not control our business partners' use of such information. Our partners are responsible for managing their own use of the personal information collected in these circumstances. We recommend you review the privacy notices of the relevant partner to find out more about their handling of your personal information.
- to comply with laws or to respond to lawful requests and legal process, to protect our rights and property and that of our agents, customers, members and others including to enforce our agreements, policies and terms of use or in an emergency to protect the personal safety of any person;
- in order to protect any individual's vital interests, but only where we believe it necessary in order to protect the vital interests of any person; and
- in connection with or during negotiation of any business transfer, merger, financing, acquisition, or dissolution transaction or proceeding involving sale, transfer, divestiture or disclosure of all or a portion of our business or assets to another company.

## **8. Legal Basis for Processing Personal Information (Visitors and Users From EEA, UK, and Switzerland Only)**

If you are a visitor or user based in the European Economic Area (“**EEA**”), Switzerland, or the United Kingdom, Dot is the data controller of your personal information unless the data is collected in circumstances where one of our affiliates is running a local event, training session or survey, for example, and they collect and control that information. In such circumstances, we will endeavor to make this clear to you in a context specific notification at the point we collect your personal information. Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it. However, we will normally collect personal information only where we have your consent to do so, where we need the personal information to perform a contract with you or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you. If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time. For more information on our legal basis for processing data, please contact us using the details provided in Section 17 of this Notice.

## **9. Security of Your Personal Information**

We take all reasonable and appropriate steps to protect your personal information in an effort to prevent loss, misuse, and unauthorized access, disclosure, alteration and destruction. We use appropriate technical and organizational measures to protect your personal information which may include: physical access controls, encryption, internet firewalls, intrusion detection and network monitoring depending on the nature of the information and the scope of processing. Our staff who may have access to your information are required to keep that information confidential.

## **10. International Data Transfers**

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country, and in some cases, may not be as protective. Specifically, our website servers are primarily located in Germany and we may process your information in jurisdictions where our affiliates/partners and third-party service providers are located. However, we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Notice. These safeguards include implementing the European Commission’s Standard Contractual Clauses for transfers of personal information between us and our business affiliates and associates to whom we transfer the information which require these companies to protect personal information they process from the EEA, United Kingdom, or Switzerland in accordance with applicable data protection law. Our Standard Contractual Clauses can be provided on request. We implement similar appropriate safeguards with our third-party service providers and further details can be provided upon request.

## 11. Your Information Choices and Changes

You may opt out of receiving promotional emails from us by following the instructions in those emails. If you opt out, we may still send you non-promotional emails, such as emails about your accounts or our ongoing business relations. You may also send requests about your contact preferences and changes to your information by emailing [hi@getdot.ai](mailto:hi@getdot.ai) or [hi@sled.so](mailto:hi@sled.so).

## 12. California Users

The California Consumer Privacy Act of 2018 (“CCPA”) as amended by the California Privacy Rights Act of 2020, effective as of January 1, 2023, requires businesses that collect personal information of California residents to make certain disclosures regarding how they collect, use, retain and disclose such information. This section addresses those requirements. For a description of all of our data collection, use and disclosure practices, please read this Privacy Notice in its entirety.

Personal Information Collection and Disclosure: Dot does not sell personal information as we understand the term sale to be defined by the CCPA and its implementing regulations. Dot does share personal information (as defined by CCPA and its implementing regulations, as set forth in the second table below. The categories of personal information we collect about you and the third parties to whom we disclose that personal information for a business purpose are as follows:

Categories of Personal Information We Collect	Categories of Third Party Recipients to Whom We Disclose Information for Business Purposes
Identifiers (such as name, address, email address)	Service providers; third parties (in connection with purposes we aim to make clear to you at or prior to collection)
Customer Records / Account Registration Information (such as address, telephone number, financial information)	Service providers; third parties (in connection with purposes we aim to make clear to you at or prior to collection)
Characteristics which may be protected classifications under California or Federal law (such as gender and marital status)	Service providers
Commercial Information (such as transaction data)	Service providers; third parties (in connection with purposes we aim to make clear to you at or prior to collection)
Internet or Other Network or Device Activity (such as browsing history or app usage)	Service providers
Geolocation Data (such as approximate location inferred from your IP address, city, country)	Service providers
Professional or Employment-Related Data (such as the name of your employer)	Service providers; third parties (in connection with purposes we aim to make clear to you at or prior to collection)

Education Information (such as degrees and certifications)	Service providers
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Categories of Personal Information Shared in the Preceding 12 Months:

Categories of Personal Information Shared	Categories of Third-Party Recipients	Purpose for Disclosure
<ul style="list-style-type: none"> <li>Identifiers and Contact Information</li> <li>Analytics or other Electronic Network Activity</li> </ul>	Social Media Platforms Advertisers, Ad Agencies, Advertising Networks and Platforms, Advertising Related Technology Providers	Cross Context Behavioral Advertising (Specific details on the cookies used for advertising are available in our Cookie Statement)

Dot does not use or disclose sensitive personal information for purposes other than those permitted purposes under the CCPA.

Dot does not have actual knowledge that it sells or shares the personal information of consumers under 16 years of age.

Retention of Personal Information: We retain personal information as described in Section 16 (Data Retention and Deletion) below.

Sources of Personal Information: The sources from which we collect personal information are described in Sections 1 (Information You Provide), 2 (Information We Automatically Collect) and 3 (Information We Receive From Third Parties) above.

Purposes for Collecting Personal Information: We collect and disclose personal information identified in the lists above to communicate with you, for marketing and promotional purposes, to provide and improve our services and other purposes set forth in Section 6 (Use of Information We Collect) above.

California Consumer Rights: California law gives California residents the right to make certain requests with regard to their personal information. Please see Section 13 (Your Privacy Rights) for a description of those rights and how you may make a request.

### 13. Your Privacy Rights

You may have privacy rights regarding your personal information.

- You may request a copy of your personal information or request to correct, update, or delete your personal information.
- You may request that we disclose what personal information we collect, including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, and the categories of third parties to whom we disclose personal information.
- Where required by law, you can object to processing of your personal information, ask us to restrict processing of your personal information, or request portability of your personal information.

- If we collected and processed your personal information with your consent, where required by law, you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- Where applicable, if you wish to submit a complaint to a data protection authority about our collection and use of your personal information, you can find contact details for data protection authorities in the EEA available [here](#), in the United Kingdom [here](#), and in Switzerland [here](#).
- Californians also have the right to opt out of the sale of personal information or the sharing of personal information for cross-context behavioral advertising, as well as the right to limit the use or disclosure of sensitive personal information for purposes other than those permitted by the CCPA if sensitive personal information is collected. As described above, we do not sell your personal information, or use or disclose sensitive personal information for purposes other than those permitted by the CCPA. You may opt-out of the sharing of personal information in the Cookie Settings.

You can submit a request by email to [hi@getdot.ai](mailto:hi@getdot.ai) or [hi@sled.so](mailto:hi@sled.so).

Dot will verify that the information you submit (which may include your first name, last name, email address, company, and country/state) matches our records before we fulfill the request.

You may use an authorized agent to submit a consumer rights request on your behalf using the methods above, however, Dot will require the authorized agent to provide signed permission to submit the request on your behalf and may still contact you to confirm your identity and that this request was submitted with your permission.

Dot does not discriminate against you for exercising your rights or offer you financial incentives related to the use of your personal information.

#### **14. Your Privacy Rights in Respect of Customer Content**

If personal information pertaining to you as an individual has been submitted to the Service by or on behalf of a Dot customer and you wish to exercise any data protection rights you may have in respect of that data under applicable law, including (as applicable) the right to access, port, correct, amend or delete such data, please inquire with the relevant Dot customer directly. We have a limited ability to access Customer Content. However, if you wish to make your request directly to us, please provide the name of the Dot customer who submitted your data to our Service. We will refer your request to that Dot customer and will support them as needed in responding to your request within a reasonable timeframe.

#### **15. Data Retention and Deletion**

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to comply with applicable legal, tax or accounting requirements, to enforce our agreements or comply with our legal obligations). When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it 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. When processing Customer

Content on behalf of our customers, we will retain Customer Content for as long as our customer instructs us to and/or as required by applicable law.

#### **16. Changes to this Notice**

We may change this Notice from time to time. If we make any changes to this Notice, we will change the Last Updated date above. If such changes are material in nature, we will provide you with additional notice (such as adding a statement to the main website page or sending you an email notification).

#### **17. How to Contact Us**

If you have any questions about this Notice or privacy-related issues, please contact us at [hi@getdot.ai](mailto:hi@getdot.ai) or [hi@sled.so](mailto:hi@sled.so) or Snowboard Software GmbH, Steingasse 13 73547 Lorch Germany.