

Last Updated: Sept 2022

General UI LLC Privacy Policy

General UI LLC (“**GenUI**”, “**we**”, “**us**,” and their derivatives) makes this Privacy Policy available to users of our websites, including genui.com and its subdomains (collectively, the “**Websites**”), and other online services we may provide (with the Websites, collectively, the “**Services**”). This Privacy Policy describes our practices for collecting, using, transferring, disclosing, protecting, storing, and otherwise processing our users’ Personal Information (defined below).

This policy applies only to Personal Information we may collect through the Services. It does not apply to any information that we collect offline or that you provide to or is collected by any third party.

1. Children

Our Services are not designed for children, and we do not intentionally collect, store, disclose, or otherwise process any Personal Information from children. A “child” is usually considered to be under the age of 16 under applicable law. If you are a parent or guardian of a child who has submitted Personal Information, please contact us at privacy@genui.com.

2. Categories of Personal Information Collected

We may collect different types of information, including Personal Information, from you depending on how you use our Services. “**Personal Information**” means information that relates to an identified or identifiable natural person. The categories of Personal Information we may collect are listed below. Certain types of Personal Information may fall under more than one category.

- Identifiers: We may collect your first and last name, IP address, and email address.
- Commercial information: We may collect records of services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- Internet or other similar network activity: We may collect information about your activity on our Websites, including, among other things, click-through behavior, IP address, browser type, and length of visit (collectively, “**Website Activity**”).
- Categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)): We may collect your first and last name.

We may also collect information that does not generally identify you. We may use information that does not identify you for any permissible business purpose under applicable law.

3. How We Collect Personal Information

Directly From You. We may collect your Personal Information when you provide it to us directly. For example, when you submit a message via our contact form, we may collect your first and last name, email address, and the content of the message sent. By way of an additional example, when you enter

into a transaction with us (e.g., hire us to perform services for your business), we may collect Personal Information to the extent necessary to complete the transaction (e.g., payment information, name, address, etc).

Automatically From You. We may collect your Personal Information automatically as you use our Services, such as your Website Activity. For more information about our use of automatic tracking technologies and certain choices we offer you with respect to them, please see the following section of this policy.

4. How We Use Cookies and Other Automatic Data Collection Technologies

Our Cookies and Other Automatic Data Collection Technologies. As you use the Services, we may use automatic data collection technologies, in particular, cookies, to collect certain Personal Information. Cookies are small data file identifiers that are transferred to your computer or mobile web browser that allow us to recognize your browser or mobile device and transfer information about you and your use of our Services. We may use cookies for many purposes, including to store your visitor preferences, record session information, improve the Services, and for marketing purposes.

Choices about Cookies and Other Automatic Data Collection Technologies. You may set your browser to refuse all or some browser cookies or to alert you when cookies are being sent. Please note that, if you disable or refuse cookies or other automatic data collection technologies, some aspects of the Services may be inaccessible or not function properly.

5. How We Use Personal Information

We may use your Personal Information in the following ways:

- To provide or improve the Services – We may use your Personal Information to process your requests to access the Services and certain of their features and to generally present and improve our Services. For example, if you share comments with us about our Services, we may use the information gathered from that interaction to help us optimize our Services in the future.
- To market the Services – We may use your Personal Information to market our Services to you. For example, we may send you notifications about special offers and promotions.
- To administer the Services and our business – We may use your Personal Information for any lawful business purpose in connection with administering the Services and our business. For example, if you reach out to us with a customer service inquiry, we may use your Personal Information to respond to you.
- In furtherance of legal, health, and safety objectives – We may access, use, and share with others your Personal Information for purposes of health, safety, and other matters in the public interest. We may also provide access to your Personal Information to cooperate with official investigations or legal proceedings (e.g., in response to subpoenas, search warrants, court orders, or other legal processes). We may also provide access to protect our rights and property and those of our agents, users, and others including to enforce our agreements, policies, and our Terms of Use (available at <https://genui.com/termservice.html>)(the “**Terms**”).

- In connection with a sale or other transfer of our business – In the event all or some of our assets are sold, assigned, transferred to, or acquired by another company due to merger, divestiture, restructuring, reorganization, dissolution, financing, acquisition, bankruptcy, or otherwise, your Personal Information may be among the transferred assets.
- As may be described to you when collecting your Personal Information.

6. To Whom Do We Disclose Your Personal Information?

Generally, GenUI does not sell Personal Information and has not done so within the 12 months preceding the “Last Updated” date above. Similarly, in the 12 months preceding the “Last Updated” date above, GenUI has disclosed categories of Personal Information listed in Section 2 above only to service providers for a business purpose.

Third-Party Service Providers

We may disclose your Personal Information to third-party service providers for a business purpose. When we disclose Personal Information for a business purpose, we attempt to ensure that appropriate protections are in place that are designed to ensure that Personal Information will be kept confidential and not be used for any purpose except performing the relevant service. Examples of service providers we have disclosed Personal Information to include server providers, email providers, and consultants, attorneys and similar service providers that are obligated to keep Personal Information secure and confidential and use it only for the purposes for which we disclose it to them.

Others

We also may disclose your Personal Information:

- To our subsidiaries and affiliates;
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by us pertaining to the users of our Services is among the assets transferred;
- To comply with any court order, law, or legal process, such as responding to a government or regulatory request;
- To enforce any contract we may have in effect with you (*e.g.*, the Terms); and
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of us, our users, or others.

7. How We Protect Your Personal Information

Our Collection, Security, and Retention Policies

We endeavor to protect your Personal Information through a combination of collection, security, and retention policies.

- Limited retention. We only keep your Personal Information for as long as we need it for business and operational needs or to comply with any statutory, regulatory, or legal obligations.

- Purpose limitation. We will use your Personal Information only for the Services you choose to access and for the purposes for which you choose to share it. We will, where required by applicable law, respect your requests to start or stop processing your Personal Information for marketing purposes, as well as the types of marketing messages you may wish to receive.
- Security measures. We strive to use appropriate measures to ensure a level of security appropriate to the risk involved with the relevant processing and endeavor to implement contractual, technical, administrative, and physical security measures designed to protect Personal Information from unauthorized access, disclosure, use, and modification. As part of our privacy compliance processes, we review these security procedures on an ongoing basis to consider new technology and methods as necessary. However, please understand that our implementation of security measures as described in this policy does not guarantee the security of your Personal Information. In the event of a security breach involving Personal Information, we will take appropriate actions (*e.g.*, notifying regulatory authorities and affected individuals) as required under applicable law.

8. Access and Deletion Requests

- You may request that GenUI disclose certain information to you about our collection and use of your Personal Information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you the following where required by applicable law:
 - The categories of Personal Information we collected about you.
 - The categories of sources for the Personal Information we collected about you.
 - Our business or commercial purpose for collecting or selling that Personal Information.
 - The categories of third parties with whom we share that Personal Information.
 - The specific pieces of Personal Information we collected about you (also known as a data portability request).
 - If we sold or disclosed your Personal Information for a business purpose, two separate lists disclosing: (a) sales, identifying the Personal Information categories that each category of recipient purchased; and (b) disclosures for a business purpose, identifying the Personal Information categories that each category of recipient obtained.
- You may request that GenUI delete any of your Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and, where applicable, direct our service providers to delete) your Personal Information from our records, unless an exception applies under applicable law. For example, we may deny your deletion request if retaining the information is necessary for us or our service providers to:
 - Complete the transaction for which we collected the Personal Information, provide the Service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
 - Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
 - Debug Services to identify and repair errors that impair existing intended functionality;

- o Exercise free speech, ensure the right of another user to exercise their free speech rights, or exercise another right provided for by law;
- o Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent;
- o Enable solely internal uses that are reasonably aligned with user expectations based on your relationship with us;
- o Comply with a legal obligation; or
- o Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Where required by applicable law, we will not discriminate against you (*e.g.*, by denying you access to the Services, charging you different prices or rates for the Services, etc.) for making a request under this Section 8.

Verifiable Consumer Requests

To make a request under this Section 8, please submit a verifiable consumer request to us at privacy@genui.com. Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your Personal Information. You may also make a verifiable consumer request on behalf of your child. You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm that the Personal Information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use Personal Information provided in a verifiable consumer request to verify your identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within 30 days of its receipt. If we require more time, we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the receipt of verifiable consumer request. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

For data portability requests, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

9. Changes to the Privacy Policy

GenUI reserves the right to change this Privacy Policy from time to time consistent with applicable law. If we make changes to this Policy, we will notify you by revising the date at the top of this Policy.

10. How to Contact Us?

If you have any questions regarding this Privacy Policy or our privacy practices, you may contact us at privacy@genui.com.