

## Fortlink.ai Privacy Policy

Fortlink.ai LLC (“**Fortlink.ai**,” “**we**,” “**us**” or “**our**”) respects the privacy of our customers, and we are committed to the responsible handling and protection of your personal information. This Privacy Policy (this “Policy”) explains the privacy practices and procedures of Fortlink.ai regarding the collection, use, and disclose of information we collect, use, and disclose of in connection with our websites, <https://fortlink.ai>(or such other URLs or web addresses as may be made available by us from time to time; the foregoing together as the “**Website**”), social media accounts, our apps and our other digital channels, tools, and properties (collectively, the “**Sites**”). The Websites include all associated protocols (e.g., https and https), subdomains and paths associated with the relevant domains. This Policy applies solely to information collected by or in connection with the Website.

You acknowledge that this Privacy Policy is part of our Terms of Use, and by using our Website, you agree to be bound by all of its terms and conditions and all applicable law and regulation. If you do not agree and consent, please do not provide us with any of your personal information and immediately discontinue your use of the Website.

### INFORMATION WE COLLECT

#### A. Information You Provide Directly to Us.

We and our agents, vendors, consultants, and other service providers (collectively, “**Service Providers**”) collect information that you provide directly to us via the Website. For example, we collect information from you when you sign up for our emails, purchase a subscription to our services, access our content, or otherwise communicate or transact with us through the Website.

The information we collect may include Personal Information. “**Personal Information**” is information that can be used to identify you by itself or when it is combined with other information, such as your name, postal address, e-mail address, or credit card.

If you submit any Personal Information relating to other people to us or to our Service Providers in connection with the Services (such as a gift of a subscription to another person), you represent that you have the authority to do so and permit us to use the information in accordance with this Privacy Policy.

We may, now or in the future, create virtual forums (e.g., Slack channel, Discord channels) to enable visitors to our Sites to communicate with us about our products and services and other related topics. Your participation in such forums may subject you to the privacy policies and terms of use of other third parties, but any Personal Information we receive or access thereby will remain subject to the terms of this Privacy Policy.

## B. Information Collected Automatically.

We and our Service Providers may automatically collect certain information about you when you access or use our Website ("**Usage Information**"). Usage Information may include your IP address, device identifier, browser type, operating system, data regarding network connected hardware, and information about your use of our Website or our services. To the extent such Usage Information can be used to identify you personally, including if we combine Usage Information with other personally identifiable information, we will treat the combined information as Personal Information under this Privacy Policy.

The methods that may be used on the Website to collect Usage Information include:

- **Log Information:** Log information is data about your use of the Website, such as IP address, browser type, internet service provider, referring/existing pages, operating system, date/time stamps, and related data, which are stored in log files.
- **Information Collected by Tracking Technologies:** Cookies, web beacons (also known as "tracking pixels"), embedded scripts, location-identifying technologies, device fingerprinting, and other tracking technologies now and hereafter ("**Tracking Technologies**") may be used to collect information about your interactions with the Website or e-mails, including information about your browsing and activity behavior.
  - *Cookies:* A cookie is a small text file that is stored on a user's device, which may be a session ID cookie or tracking cookie. Session cookies make it easier for you to navigate the Website. They expire when you close your browser. Tracking cookies help us and our Service Providers understand how you use the Website, and remain on your device longer. The Website may associate some or all of these types of cookies with your devices. Cookies may remain on your device for extended periods of time.
  - *Web Beacons (also known as "tracking pixels"):* Web beacons are small graphic images, also known as "internet tags" or "clear gifs," embedded in web pages and e-mail messages. Web beacons may be used to count the number of visitors to the Website, to monitor how users navigate the Website, and to count content views
  - *Embedded Scripts:* An embedded script is programming code designed to collect information about your interactions with the Website. It is temporarily downloaded onto your device for our web service or a Service Provider, is active only while you are connected to the Service, and is deleted or deactivated thereafter.
  - *Location-identifying Technologies:* Location-aware technologies locate (sometimes precisely) you for purposes such as verifying your location and delivering or restricting relevant content based on our location.
  - *Device Fingerprinting:* Device fingerprinting is the process of analyzing and combining sets of information elements from your device's browser, such as JavaScript objects and installed fonts, in order to create a "fingerprint" of your device and uniquely identify your device.

Some information about your use of the Website and certain Third Party Services (defined below in the section entitled *“Links and Connections To Third-Party Services, Features, and Devices”*) may be collected using Tracking Technologies across time and services and used by us and our Service Providers for purposes such as to associate different devices you use, and deliver relevant ads and/or other content to you on the Website and certain Third Party Services.

For further information on Tracking Technologies and your choices regarding them, please see the sections entitled *“Third Party Services, Features, and Devices,”* and *“Your Choices,”* below.

## **HOW WE USE YOUR INFORMATION**

We and our Service Providers, upon our instruction and authorization, may use information about you, including your Personal Information, consistent with our statements under this Privacy Policy or as permitted by applicable law, including to:

- To respond to your inquiries and fulfill your requests, such as to send you newsletters or whitepapers.
- To set up and administer your account when you purchase a subscription.
- To send administrative information to you, such as information regarding our services or the Website and changes to our terms, conditions and policies.
- To complete and fulfill your subscription purchase, including communicating with you regarding your subscription and providing you with related customer service or support.
- To send you marketing communications about Fortlink.ai that we believe may be of interest to you, subject to any choices you have expressed with respect to such communications (for more information about how to manage these communications and marketing efforts, please see *“Third Party Services, Features, and Devices,”* and *“Your Choices”* sections below).
- To personalize your experience on the Website by presenting content, products and offers tailored to you.
- To request your participation in surveys and to administer such surveys. We may use the results of such surveys to understand user engagement, as well as improve the service for our members.
- To facilitate social sharing functionality.
- For our business and operations purposes, such as internal data analysis, audits, prevention of unauthorized intrusions, developing new products, enhancing, improving or modifying our services or the Website, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.

We will not use information we’ve collected from you for purposes that are materially different, unrelated, or incompatible with this Privacy Policy without providing you with prior notice.

Personal Information once “de-identified” or “aggregated” is not subject to this Privacy Policy and we and our Service Providers may treat it as non-Personal Information and use it without obligation to you except as prohibited by applicable law.

## **HOW WE MAY SHARE OR DISCLOSE YOUR INFORMATION**

We may share your information, including Personal Information and Usage Information with our Service Providers in order for them to perform the activities listed above in the section entitled “*How We Use Your Information*” Our Service Providers perform these services at our instruction or on our behalf. Our Service Providers are prohibited from using or disclosing your Personal Information for any other purposes, although we may permit them to use aggregate information which does not identify you or de-identified data for other purposes.

We may also share information about you with third parties for any purposes consistent with our statements under this Privacy Policy or as permitted by applicable law, including as follows:

- To comply with the law or other legal process, and where required, in response to lawful requests by public authorities, including to meet national security or law enforcement requirements;
- To protect the rights, property, life, health, security and safety of us, the Service or any third party;
- In connection with, or during negotiations of, any proposed or actual merger, purchase, sale or any other type of acquisition or business combination of all or any portion of our assets, or transfer of all or a portion of our business to another company;
- With our affiliates for internal business purposes;
- For purposes disclosed at the time you provide Personal Information; and
- With your consent or at your direction.

Without limiting the foregoing, in our sole discretion, we may share aggregated information which does not identify you or de-identified information about you with third parties or affiliates for any purpose.

## **LINKS AND CONNECTIONS TO THIRD-PARTY SERVICES, FEATURES, AND DEVICES**

Our Website may contain content from and links to websites, advertising, third-party apps, services, and tools operated and owned by third parties (“**Third Party Services**”). Third Parties may use Tracking Technologies (as defined above) to independently collect information about you and may solicit Personal Information from you.

Our Website also contains Tracking Technologies operated by third parties. For example, analytics services, such as Google Analytics, may use Tracking Technologies on our Website to help us analyze your use of the Website, compile statistical reports on the Website’s activity, and provide other services

relating to Website activity and internet usage. Similarly, ad service services, advertisers, and other third parties may use Tracking Technologies on our Website and Third Party Services to track your activities across time and services, and tailor ads to you based on your activities, which may include sending you an ad on a Third Party Service or third party device after you had left the Website (**“Interest-Based Advertising”**).

The information collected and stored by third parties, whether through our Website, a Third Party Service, or a third party device, remains subject to their own policies and practices, including what information they share with us, your choices on their services and devices, and whether they store information in the U.S. or elsewhere. We are not responsible for and make no representations regarding third party policies and practices, and encourage you to familiarize yourself with and consult their privacy policies and terms of use. To the extent we combine information we receive from third parties with Personal Information we collect directly from you on the Website, we will treat the combined information as Personal Information under this Privacy Policy.

For further information on Tracking Technologies and your choices regarding them, please see *“Information Collected Automatically”* above, and *“Your Choices”* below.

## **YOUR CHOICES**

### **A. Tracking Technologies Generally.**

Regular cookies may generally be disabled or removed by tools available as part of most commercial browsers, and in some instances blocked in the future by selecting certain settings. Browsers offer different functionalities and options so you may need to set them separately. Please be aware that if you disable or remove cookies some parts of the Website or our services may not work and that when you revisit the Website your ability to limit browser-based Tracking Technologies is subject to your browser settings and limitations.

Your browser settings may allow you to automatically transmit a “Do Not Track” signal to online services you visit. Note, however, there is no industry consensus as to what site and app operators should do with regard to these signals. Accordingly, we do not monitor or take action with respect to “Do Not Track” signals or other mechanisms.

### **B. Analytics and Advertising Tracking Technologies.**

You may exercise choices regarding the use of cookies from Google Analytics by going to <https://tools.google.com/dlpage/gaoptout> or downloading the Google Analytics Opt-out Browser Add-on.

You may choose whether to receive Interest-based Advertising by submitting opt outs. Some of the advertisers and Service Providers that perform advertising-related services for us and our partners may participate in the Digital Advertising Alliance ("DAA") Self-Regulatory Program for Online Behavioral Advertising. To learn more about how you can exercise certain choices regarding Interest-based Advertising, visit <http://www.aboutads.info/choices>. Some of these companies may also be members of the Network Advertising Initiative ("NAI"). To learn more about the NAI and your opt-out options for their members, see <http://www.networkadvertising.org/choices/>. Please be aware that, even if you are able to opt out of certain kinds of Interest-based Advertising, you may continue to receive other types of ads. Opting out only means that those selected members should no longer deliver certain Interest-based Advertising to you, but does not mean you will no longer receive any targeted content and/or ads (e.g., from other ad networks). We are not responsible for effectiveness of, or compliance with, any third-parties' opt out options or programs or the accuracy of their statements regarding their programs.

### C. Communications.

You can opt out of receiving certain promotional e-mails from us at any time by following the instructions as provided in e-mails to click on the unsubscribe link or by sending an e-mail to us at the address below with the word UNSUBSCRIBE in the subject field of the e-mail. Please note that your opt-out is limited to the e-mail address used and will not affect subsequent subscriptions or non-promotional communications, such as those about your account, transactions, servicing, or our ongoing business relations.

Unsubscribe address: [unsubscribe@fortlink.ai](mailto:unsubscribe@fortlink.ai)

## **HOW WE SECURE INFORMATION**

Fortlink.ai takes data security seriously, and we use appropriate technologies and procedures to protect information we collect from you, including your Personal Information. Our information security policies and procedures are closely aligned with widely accepted international standards and are reviewed regularly and updated as necessary to meet our business needs, changes in technology, and regulatory requirements. Where appropriate, we password protect, use encryption techniques and install firewalls. We encourage our participating Service Providers to adopt and honor their own consumer privacy policies.

Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. We cannot ensure or warrant the security of any information that you transmit to us, or that we transmit to you, or guarantee that it will be free from unauthorized access by third parties.

Please also be aware that we may use third-party cloud service providers that provide hosting, data storage and other services pursuant to standard terms and conditions that may be non-negotiable.

These Service Providers have informed us or the general public that they apply security measures they consider adequate for the protection of information within their systems.

If you have reason to believe that your interaction with us is no longer secure, please immediately notify and contact us at [privacy@fortlink.ai](mailto:privacy@fortlink.ai).

## **DATA STORAGE IN THE UNITED STATES**

We use and rely on third party data hosting services to host our Website on servers located in the United States ("**Hosting Services**"). This means that if you do not reside in the U.S., then your information, including your Personal Information, will be transferred out of your country of residence and to the U.S., and such information will be processed and stored in the U.S.

The policies and practices described in this Privacy Policy do not apply to Hosting Services and we make no warranty or claim regarding the privacy, confidentiality, integrity and security of any information and data stored or retained by Hosting Services.

If you do not want your Personal Information to be transferred to a server located in the U.S., you should not provide us with your Personal Information or use the Website.

If you are not a resident of the U.S., by using the Website, you consent to the storage and processing of such information in the United States, which may have data protection laws that are different from those of your country of residence.

## **RETENTION OF INFORMATION**

We retain Personal Information for as long as we deem reasonable for legal or business purposes. In determining data retention periods, We take into consideration U.S. federal and state laws and contractual obligations. When we no longer need Personal Information, we securely delete or destroy it, in accordance with applicable laws.

## **USE OF SERVICES BY MINORS**

Our Website and our services are intended specifically for adults and not for children under 18 years old or the age of majority established under the applicable U.S. state law.

## **SENSITIVE INFORMATION**

Do not send us, and do not disclose, any sensitive Personal Information (*e.g.*, Social Security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics or criminal background) through our Website or otherwise to us.

#### **CHANGES TO THIS PRIVACY POLICY**

Fortlink.ai reserves the right to change this Privacy Policy in its sole discretion at any time. Any changes will become effective when we post the revised Privacy Policy on our Website. Your use of the Website following such changes means that you accepted the revised Privacy Policy.

#### **CONTACT US**

We want to be clear about our privacy practices so that you can make an informed choice about the use of your information, so if you have any questions about this Privacy Policy, please contact us at [privacy@fortlink.ai](mailto:privacy@fortlink.ai).

Because email communications are not always secure, please do not include credit card or other sensitive information in your emails to us.

**Effective Date: June 30, 2023**