

## Revenew Privacy Policy

*Last revised August 16, 2023*

This privacy notice for Revenew Technologies, Inc. (doing business as Revenew) ("Revenew," "we," "us," or "our"), describes how and why we might process your personal information when you use our services ("Services"), such as when you:

- Use our website and web applications and APIs available under the [renew.co](https://renew.co) and [renew.dev](https://renew.dev) domains, related mobile applications and all services, content, tools, features, and functionalities offered on or through our sites and mobile applications;
- Engage with us in other related ways, including any sales, marketing, or events.

This privacy notice does not apply to our handling of personal information that we process on behalf of our business customers as a service provider or processor. Our processing of that information is governed by our agreement with our business customers.

Questions or concerns? Reading this privacy notice will help you understand your privacy rights and choices. If you still have any questions or concerns, please contact us at [privacy@renew.co](mailto:privacy@renew.co).

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### SUMMARY OF KEY POINTS

This summary provides key points from our privacy notice, but you can find out more details about any of these topics by clicking the link following each key point or by using our table of contents below to find the section you are looking for. You can also click [here](#) to go directly to our table of contents.

What personal information do we process? The types of personal information we process when you visit, use, or navigate our Services depend on how you interact with Revenew and the Services, the choices you make, and the products and features you use. Click [here](#) to learn more.

How do we process your personal information? We process your personal information to provide, improve, and administer our Services, communicate with you, for marketing purposes, for security and fraud prevention, and to comply with law. We may also process your personal information for other purposes with your consent. Click [here](#) to learn more.

In what situations and to which types of parties do we disclose personal information? We may disclose personal information in specific situations and with specific categories of third parties. Click [here](#) to learn more.

How do we keep your personal information safe? We have organizational and technical processes and procedures in place designed to protect your personal information. However, 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 personal information. Click [here](#) to learn more.

What are your rights? Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information. Click [here](#) to learn more.

How do you exercise your rights? Please contact us by email at [privacy@renew.co](mailto:privacy@renew.co). We will consider and act upon any request in accordance with applicable data protection laws.

Want to learn more about what Renew does with any personal information we collect? Click [here](#) to review the notice in full.

## 1. WHAT PERSONAL INFORMATION DO WE COLLECT?

Personal information you disclose to us

In Short: We collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when you register on the Services, express an interest in obtaining information about us or our products and Services, when you participate in activities on 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:

- names
- phone numbers
- email addresses
- mailing addresses
- usernames
- passwords
- contact preferences
- contact or authentication data
- billing addresses

Payment Data. We may collect data necessary to process your payment if you make purchases, such as your payment instrument number, and the security code associated with your payment instrument. All payment data is stored by Stripe. You may find Stripe's privacy notice link(s) here: <https://stripe.com/gb/privacy>.

Third-Party Account Data. We may provide you with the option to register with us using a third-party account, like Google or Microsoft. If you choose to register in this way, we will collect the information described in the section called "THIRD-PARTY ACCOUNTS" below.

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

Information automatically collected

In Short: 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.

Like many businesses, we also collect information through cookies and similar technologies.

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 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.

## 2. HOW DO WE PROCESS YOUR PERSONAL INFORMATION?

In Short: We process your personal information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your personal information for other purposes with your consent.

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 personal 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 personal information to provide you with the requested service.

- To respond to user inquiries/offer support to users. We may process your personal 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 personal information to send you details about our products and services, changes to our terms and policies, and other similar information.
- To send you direct marketing communications as permitted by law, including, but not limited to, notifying you of special promotions, offers and events via email. You may opt out of our marketing communications as described in the “WHAT ARE YOUR PRIVACY RIGHTS?” section below.
- For compliance and protection purposes, including to:
  - Comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities.
  - Protect our, your or others’ rights, privacy, safety, or property (including by making and defending legal claims).
  - Audit our internal processes for compliance with legal and contractual requirements and internal policies.
  - Enforce the terms and conditions that govern our website and Services.
  - Prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.
- For research and development. We may use your personal information for research and development purposes, including to analyze and improve our Services and our business. As part of these activities, we may create aggregated, de-identified, or other anonymous data from personal information we collect. We make personal information into anonymous data by removing information that makes the data personally identifiable to you. We may use this anonymous data and disclose it to third parties for our lawful business purposes, including to analyze and improve our Services and promote our business.

### 3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR PERSONAL INFORMATION?

In Short: We only process your personal information when we have a valid legal reason (i.e., legal basis) to do so under applicable law, like to fulfill our legitimate business interests, to comply with laws, to provide you with services or otherwise perform a contract we have entered into with you, or with your consent.

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

We generally rely on one or more of the following legal bases to process your personal information:

- Legitimate interests. We may process your personal information where it is necessary for our legitimate business purposes, your interest or the interests of a third party, and your interests and fundamental rights do not override those legitimate interests.
- 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.
- Legal Obligations. We may process your personal 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 personal information as evidence in litigation in which we are involved.
- Consent. We may process your personal 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. Click [here](#) to learn more.

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 is the "data controller" responsible for your personal information, and we merely process your personal information on their behalf in accordance with their 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 personal 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. Click [here](#) to learn more.

In some exceptional cases, we may be legally permitted under applicable law to process your personal 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. WHEN AND TO WHOM DO WE DISCLOSE YOUR PERSONAL INFORMATION?

In Short: We may disclose your personal 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 disclose your data to 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. The categories of third parties we may disclose personal information with are as follows:

- Cloud Computing Services
- Data Analytics Services
- Communication & Collaboration Tools
- Data Storage Service Providers
- Payment Processors
- Sales & Marketing Tools
- User Account Registration & Authentication Services

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

**Affiliates.** We may disclose your personal information to our corporate parent, subsidiaries, and affiliates, for purposes consistent with this privacy notice.

**Business Transfers.** We may share or transfer your personal 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.

**Authorities and others.** We may disclose your personal information to law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for the compliance and protection purposes described above.

## **5. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?**

**In Short:** We may use cookies and other tracking technologies to collect and store your information.

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information for the purpose of helping you navigate between pages efficiently, remembering your preferences, enabling functionality, and helping us understand user activity and patterns. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Notice.

## **6. THIRD-PARTY ACCOUNTS**

**In Short:** If you choose to register or log in to our Services using a third-party account, we may have access to certain information about you.

Our Services offer you the ability to register and log in using your third-party account details (like your Google or Microsoft logins). Where you choose to do this, we will receive certain profile information about you from the relevant third party provider. The profile information we receive may vary depending on the provider concerned and the privacy permissions you have configured within that account, but will often include your name, email address and profile picture.

We will use the information we receive only for the purposes that are described in this privacy notice or that are otherwise made clear to you on the relevant Services. Please note that we do not control, and are not responsible for, other uses of your personal information by your third-party provider. We recommend that you review their privacy notice to understand how they collect, use, and share your personal information, and how you can set your privacy preferences on their sites and apps.

## **7. IS YOUR PERSONAL INFORMATION TRANSFERRED INTERNATIONALLY?**

In Short: We may transfer, store, and process your personal 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 personal 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 "WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?" above), in the United States, and other countries that may not be regarded as providing the same level of protection to personal information as the jurisdiction in which you are based.. When transferring personal information across borders, we take steps to put in place safeguards to protect your personal information in accordance with this privacy notice and applicable law. These safeguards may include:

- if you reside in the UK or the EEA, relying on a UK government adequacy regulation or adequacy decision by the European Commission;
- entering into agreements that include contractual protections for the transfer of your personal information (such as Standard Contractual Clauses approved by the European Commission and the international data transfer agreement approved by the UK government).

For more information about the safeguards we have in place in relation to the transfer of your personal information, please contact us by using the contact details provided in the section "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?" below.

## **8. HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?**

In Short: We keep your personal information for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law.

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).

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.

## **9. HOW DO WE KEEP YOUR PERSONAL INFORMATION SAFE?**

In Short: We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented 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 personal 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 personal 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.

## **10. DO WE COLLECT PERSONAL INFORMATION FROM MINORS?**

In Short: We do not knowingly collect data from or market to children under 13 years of age.

We do not knowingly solicit data from or market to children under 13 years of age. If we learn that we have collected personal information from users less than 13 years of age without the consent of the child's parent or guardian as required by law, 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 13, please contact us at [privacy@renew.co](mailto:privacy@renew.co).

## 11. WHAT ARE YOUR PRIVACY RIGHTS?

In Short: We offer you choices that affect how we handle the personal information that we control. You may review, change, or terminate your account at any time.

Personal information requests. Depending on your location and the nature of your interactions with our Services, you may request the following in relation to personal information: (i) request access and obtain a copy of your personal information, (ii) request rectification or erasure; (iii) restrict the processing of your personal information; (iv) obtain personal information that you consented to provide or that is necessary to perform a contract with us, and that is processed by automated means, in a structured, commonly used and machine-readable format (data portability); and (v) in certain circumstances, object to the processing of your personal information. If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. 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.

You can make such a request by contacting us by using the contact details provided in the section "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?" below.

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

Depending on where you reside, you may have the right to complain to a data protection regulator where you live or work, or where you feel a violation has occurred.

If you are located in the EEA, click here to find your local supervisory authority [https://edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://edpb.europa.eu/about-edpb/about-edpb/members_en), and here if you are located in the UK: <https://ico.org.uk/make-a-complaint>.

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

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, or by contacting us using the details provided in the section "[HOW CAN YOU CONTACT US ABOUT THIS NOTICE?](#)" below. You will then be removed from the marketing lists. However, 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 you would at any time like to review or change the information in your account or terminate your account, you can:

- Log in to your account settings and update your user account.

Upon your request to terminate your account, we will deactivate or delete your account and 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.



If you have questions or comments about your privacy rights, you may email us at [privacy@renew.co](mailto:privacy@renew.co).

## **12. CONTROLS FOR DO-NOT-TRACK FEATURES**

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

## **13. DO WE MAKE UPDATES TO THIS NOTICE?**

In Short: Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy notice from time to time. 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 personal information.

## **14. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?**

If you have questions or comments about this notice, you may contact us by email at [privacy@renew.co](mailto:privacy@renew.co), or by post to:

Renew Technologies, Inc.  
447 Sutter St Ste 405 PMB 287  
San Francisco, CA 94108  
United States