

# Pareto Privacy Policy

*Last Updated: July 10, 2024*

*Welcome to Pareto AI! Pareto Inc. ("Pareto", "we", "us", or "our") respects your privacy and is committed to protecting your personal information. Please read the following policy to understand how we collect, use, and disclose your information, and what choices you have with respect to your information. You can also access a printable version of this Privacy Policy [here](#).*

We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about this privacy notice, or our practices with regards to your personal information, please contact us at [support@pareto.ai](mailto:support@pareto.ai).

When you visit our website <https://pareto.ai> (the "Website"), our application <https://forte.pareto.ai> (the "App"), and more generally, use any of our services (the "Services", which include the Website and App), we appreciate that you are trusting us with your personal information. We take your privacy very seriously. In this privacy notice, we seek to explain to you in the clearest way possible what information we collect, how we use it, and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy notice that you do not agree with, please discontinue use of our Services immediately.

This privacy notice applies to all information collected through our Services (which, as described above, includes our Website and App), as well as any related services, sales, marketing, or events.

**Please read this privacy notice carefully as it will help you understand what we do with the information that we collect.**

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## **1. WHAT INFORMATION DO WE COLLECT?**

Personal Information You Disclose to Us

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

We collect personal information that you voluntarily provide to us when you register on the Website and the App, express an interest in obtaining information about us or our products and Services, when you participate in activities on the Website and App (such as by posting messages in our online forums or entering competitions, contests or giveaways) or otherwise when you contact us.

The personal information that we collect depends on the context of your interactions with us and the Website or App, the choices you make and the products and features you use. The personal information we collect may include the following:

### **Personal Information Provided by You.**

We collect names; email addresses; job titles; passwords; usernames; phone numbers; mailing addresses; billing addresses; debit/credit card numbers; contact or authentication data; contact preferences; and other similar information.

### **Payment Data.**

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

### **Social Media Login Data.**

We may provide you with the option to register with us using your existing social media account details, like your Facebook, Twitter, or other social media account. If you choose to register in this way, we will collect the information described in the section called "[HOW DO WE HANDLE YOUR SOCIAL LOGINS](#)" 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 Website and App.*

We automatically collect certain information when you visit, use or navigate the Website and App. 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 who and when you use our Website and other technical information. This information is primarily needed to maintain the security and operation of our Website, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies. You can find out more about this in our Cookie Notice: [pareto.ai/cookie](https://pareto.ai/cookie). Beyond this data, when using the App, we collect session data, such as information which gives mouse position and click patterns, to help us better understand how you use our services. Furthermore, we use essential cookies to enable authorization and authentication of users when accessing our App.

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 Website or App 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, settings, and information about your activity on the Website and App (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).

Information Collected From Other Sources

***In Short:*** We may collect limited data from public databases, marketing partners, social media platforms, and other outside sources.

In order to enhance our ability to provide relevant marketing, offers, and services to you and update our records, we may obtain information about you from other sources, such as public databases, joint marketing partners, affiliate programs, data providers, social media platforms, as well as from other third parties. This information includes mailing addresses, job titles, email addresses, phone numbers, intent data (or user behavior data), Internet Protocol (IP) addresses, social media profiles, social media URLs, and custom profiles, for purposes of targeted advertising and event promotion. If you interact with us on a social media platform using your social media account (e.g. Facebook or Twitter), we receive personal information about you such as your name, email address, and gender. Any personal information that we collect from your social media account depends on your social media account's privacy settings.

## **2. HOW DO WE USE YOUR INFORMATION?**

***In Short:*** We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent.

We use personal information collected via our Website and App for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

**To Facilitate Account Creation and Logon Process.**

If you choose to link your account with us to a third-party account (such as your Google account), we use the information you allowed us to collect from those third parties to facilitate account creation and logon process for the performance of the contract. See the section below headed " HOW DO WE HANDLE YOUR SOCIAL LOGINS" for further information.

**To Post Testimonials.**

We post testimonials on our Website that may contain personal information. Prior to posting a testimonial, we will obtain your consent to use your name and the content of the testimonial. If you wish to update, or delete your testimonial, please contact us at [phoebe@pareto.ai](mailto:phoebe@pareto.ai) and be sure to include your name, testimonial location, and contact information.

**Request Feedback.**

We may use your information to request feedback and to contact you about your use of our Website and App.

**To Enable User-to-User Communications.**

We may use your information in order to enable user-to-user communications with each user's consent.

**To manage User Accounts.**

We may use your information for the purposes of managing our account and keeping it in working order.

**To Send Administrative Information to You.**

We may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions, and policies.

**To Protect Our Services.**

We may use your information as part of our efforts to keep our Website and App safe and secure (for example, for fraud monitoring and prevention).

**To Enforce Our Terms, Conditions and Policies for Business Purposes, to Comply With Legal and Regulatory Requirements or in Connection With Our Contract.**

**To Respond to Legal Requests and Prevent Harm.**

If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.

**Fulfill and Manage Your Orders.**

We may use your information to fulfill and manage your orders, payments, returns, and exchanges made through the Website and App.

**Administer Prize Draws and Competitions.**

We may use your information to administer prize draws and competitions when you elect to participate in our competitions.

**To Deliver and Facilitate Delivery of Services to The User.**

We may use your information to provide you with the requested service.

**To Respond to User Inquiries/Offer Support to Users.**

We may use your information to respond to your inquiries and solve any potential issues you might have with the use of our Services.

**To Send You Marketing and Promotional Communications.**

We and/or our third-party marketing partners may use the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. For example, when expressing an interest in obtaining information about us or our Website and App, subscribing to marketing or otherwise contacting us, we will collect personal information from you. You can opt-out of our marketing emails at any time (see the "WHAT ARE YOUR PRIVACY RIGHTS" below).

**Deliver Targeted Advertising to You.**

We may use your information to develop and display personalized content and advertising (and work with third parties who do so) tailored to your interests and/or location and to measure its effectiveness. For more information, see our Cookie Notice: [pareto.ai/cookie](https://pareto.ai/cookie).

**For Other Business Purposes.**

We may use your information for other business purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Website, App, products, marketing and your experience. We may use and store this information in aggregated and anonymized form so that it is not associated with individual end-users and does not include personal information. We will not use identifiable personal information without your consent.

**3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?**

***In Short:** We only share information with your consent, to comply with laws, to provide you with services, to protect your rights, or to fulfill business obligations.*

We may process or share your data that we hold based on the following legal basis:

**Consent:**

We may process your data if you have given us specific consent to use your personal information for a specific purpose.

**Legitimate Interests:**

We may process your data when it is reasonably necessary to achieve our legitimate business interests.

**Performance of a Contract:**

Where we have entered into a contract with you, we may process your personal information to fulfill the terms of our contract.

**Legal Obligations:**

We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal processes, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).

**Vital Interests:**

We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process your data or share your personal information in the following situations:

**Business Transfers.**

We may share or transfer your 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.

**Vendors, Consultants and Other Third-Party Service Providers.**

We may share your data with third-party vendors, service providers, contractors, or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include: payment processing, data analysis, email delivery, hosting services, customer service, and marketing efforts. We may allow selected third parties to use tracking technology on the Website and App, which will enable them to collect data on our behalf about how you interact with our Website and App over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content, pages, or features, and better understand online activity. Unless described in this notice, we do not share, sell, rent, or trade any of your information with third parties for their promotional purposes. We have contracts in place with our data processors, which are designed to help safeguard your personal information. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will also not share your personal information with any organization apart from us. They also commit to protect the data they hold on our behalf and to retain it for the period we instruct.

**Affiliates.**

We may share your information with our affiliates, in which case we will require those affiliates to honor this privacy notice. Affiliates include our parent company and any subsidiaries, joint venture partners, or other companies that we control or that are under common control with us.

**Business Partners.**

We may share your information with our business partners to offer you certain products, services, or promotions.

#### **Other Users.**

When you share personal information (for example, by posting comments, contributions, or other content to the Website and App) or otherwise interact with public areas of the Website and App, such personal information may be viewed by all users and may be publicly made available outside the Website and App in perpetuity. If you interact with other users of our Website or App and register for our Website or App through a social network (such as Facebook), your contacts on the social network will see your name, profile photo, and descriptions of your activity. Similarly, other users will be able to view descriptions of your activity, communicate with you within our Website and App, and view your profile.

### **4. WHO WILL YOUR INFORMATION BE SHARED WITH?**

***In Short:** We only share information with the following third parties.*

We only share and disclose your information with the following third parties. We have categorized each party so that you may easily understand the purpose of our data collection and processing practices. If we have processed your data based on your consent and you wish to revoke your consent, please contact us using the contact details provided in the section below titled "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?".

#### **Advertising, Direct Marketing, and Lead Generation**

Google AdSense and Intercom

#### **Allow Users to Connect to Their Third-Party Accounts**

Google account and LinkedIn account

#### **Communicate and Chat with Users**

Sendgrid

#### **Content Optimization**

Google Fonts and Google Site Search

#### **Functionality and Infrastructure Optimization**

Amazon Web Services and Vercel

#### **Invoice and Billing**

Stripe

#### **Retargeting Platforms**

Google Ads Remarketing

#### **User Account Registration and Authentication**

Auth0

#### **Web and Mobile Analytics**

Segment and Microsoft Clarity

## **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. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Notice: [pareto.ai/cookie](https://pareto.ai/cookie).

## **6. HOW DO WE HANDLE YOUR SOCIAL LOGINS?**

***In Short:** If you choose to register or log in to our services using a social media account, we may have access to certain information about you.*

Our Website offers you the ability to register and login using your third-party social media account details (like your Google). Where you choose to do this, we will receive certain profile information about you from your social media provider. The profile Information we receive may vary depending on the social media provider concerned, but will often include your name, email address, friends list, profile picture as well as other information you choose to make public on such social media platform.

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 Website. Please note that we do not control, and are not responsible for, other uses of your personal information by your third-party social media 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 INFORMATION TRANSFERRED INTERNATIONALLY?**

***In Short:** We may transfer, store, and process your information in countries other than your own.*

Our servers are located in the United States. If you are accessing our Website or App from outside the United States, please be aware that your 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 "WILL YOUR INFORMATION BE SHARED WITH ANYONE?" above), in United States, Philippines, and other countries.

If you are a resident in the European Economic Area, then these countries may not necessarily have data protection laws or other similar laws as comprehensive as those in your country. We will however take all necessary measures to protect your personal information in accordance with this privacy notice and applicable law.

European Commission's Standard Contractual Clauses:

We have implemented measures to protect your personal information, including by using the European Commission's Standard Contractual Clauses for transfers of personal information between our group companies and between us and our third-party providers. These clauses require all recipients to protect all personal information that they process originating from the



EEA in accordance with European data protection laws and regulations. Our Standard Contractual Clauses can be provided upon request. We have implemented similar appropriate safeguards with our third-party service providers and partners and further details can be provided upon request.

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

***In Short:** We keep your 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). No purpose in this notice will require us to keep your personal information for longer than the period of time in which users have an account with us.

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 INFORMATION SAFE?**

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

We have implemented appropriate 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 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 information. Although we will do our best to protect your personal information, transmission of personal information to and from our Website and App is at your own risk. You should only access the Website and App within a secure environment.

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

***In Short:** We do not knowingly collect data from or market to children under 18 years of age.*

We do not knowingly solicit data from or market to children under 18 years of age. By using the Website and App, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Website and App. If we learn that personal information from users less than 18 years of age has been collected, 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 18, please contact us at [phoebe@pareto.ai](mailto:phoebe@pareto.ai).

## **11. WHAT ARE YOUR PRIVACY RIGHTS?**

***In Short:*** *In some regions, such as the European Economic Area, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.*

In some regions (like the European Economic Area), you have certain rights under applicable data protection laws. These may include the rights:

- To request access and obtain a copy of your personal information.
- To request rectification or erasure,
- To restrict the processing of your personal information; and
- If applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. To make such a request, please use the [contact details](#) provided below. We will consider and act upon any request in accordance with applicable data protection laws.

If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

If you are resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm).

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

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

#### 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.
- Contact us using the contact information provided.

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 Terms of Use and/or comply with applicable legal requirements.

#### Cookies and Similar Technologies:

Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Website and App. To opt-out of

interest-based advertising by advertisers on our Website or App visit <http://www.aboutads.info/choices/>. For further information, please see our Cookie Notice: [pareto.ai/cookies](http://pareto.ai/cookies).

### Opting Out of Email Marketing:

You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below. You will then be removed from the marketing email list – however, we may still communicate with you, for example to send you service-related emails that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes. To otherwise opt-out, you may: **Contact us using the contact information provided.**

## 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 CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

***In Short:** Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information.*

California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with the Website or App, you have the right to request removal of unwanted data that you publicly post on the Website and App. To request removal of such data, please contact us using the contact information provided below, and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Website or App, but please be aware that the data may not be completely or comprehensively removed from all our systems (e.g. backups, etc.).

### CCPA Privacy Notice

The California Code of Regulations defines a "resident" as:

- Every individual who is in the State of California for other than a temporary or transitory purpose and

- Every individual who is domiciled in the State of California who is outside the State of California for a temporary or transitory purpose

All other individuals are defined as "non-residents."

If this definition of "resident" applies to you, certain rights and obligations apply regarding your personal information.

### **What Categories of Personal Information Do We Collect?**

We have collected the following categories of personal information in the past twelve (12) months:

Category	Examples	Collected
A. Identifiers	Contact details, such as real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address and account name	YES
B. Personal information categories listed in the California Customer Records statute	Name, contact information, education, employment, employment history and financial information	YES
C. Protected classification characteristics under California or federal law	Gender and date of birth	YES
D. Commercial information	Transaction information, purchase history, financial details and payment information	YES
E. Biometric information	Fingerprints and voiceprints	NO
F. Internet or other similar network activity	Browsing history, search history, online behavior, interest data, and interactions with our and other websites, applications, systems and advertisements	YES
G. Geolocation data	Device location	NO
H. Audio, electronic, visual, thermal, olfactory, or similar information	Images and audio, video or call recordings created in connection with our business activities	NO
I. Professional or employment-related information	Business contact details in order to provide you our services at a business level, job title as well as work history and professional qualifications if you apply for a job with us	YES
J. Education Information	Student records and directory information	NO
K. Inferences drawn from other personal information	Inferences drawn from any of the collected personal information listed above to create a profile or summary about, for example, an individual's preferences and characteristics	YES

We may also collect other personal information outside of these categories in instances where you interact with us in-person, online, or by phone or mail in the context of:

Receiving help through our customer support channels

Participation in customer surveys or contests; and

Facilitation in the delivery of our Services and to respond to your inquiries

### **How do we use and share your personal information?**

Pareto Inc. collects and shares your personal information through:

- Targeting cookies/Marketing cookies
- Social media cookies
- Beacons/Pixels/Tags

More information about our data collection and sharing practices can be found in this privacy notice and our Cookie Notice: [pareto.ai/cookies](https://pareto.ai/cookies).

You may contact us by email at [support@pareto.ai](mailto:support@pareto.ai), or by referring to the contact details at the bottom of this document.

If you are using an authorized agent to exercise your right to opt-out, we may deny a request if the authorized agent does not submit proof that they have been validly authorized to act on your behalf.

### **Will Your Information Be Shared With Anyone Else?**

We may disclose your personal information with our service providers pursuant to a written contract between us and each service provider. Each service provider is a for-profit entity that processes the information on our behalf.

The current list of our service providers can be found below.

We may use your personal information for our own business purposes, such as for undertaking internal research for technological development and demonstration. This is not considered to be "selling" of your personal data.

Pareto Inc. has disclosed the following categories of personal information to third parties for a business or commercial purpose in the preceding twelve (12) months:

- **Category A.** Identifiers, such as contact details, like your real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address and account name.
- **Category B.** Personal information, as defined in the California Customer Records law, such as your name, contact information, education, employment, employment history and financial information.

The categories of third parties to whom we disclosed personal information for a business or commercial purpose can be found under ["WHO WILL YOUR INFORMATION BE SHARED WITH?"](#).

### **Your Rights With Respect to Your Personal Data**

#### **Right to request deletion of the data - Request to delete**

You can ask for the deletion of your personal information. If you ask us to delete your personal information, we will respect your request and delete your personal information, subject to certain exceptions provided by law, such as (but not limited to) the exercise by another consumer of his or her right to free speech, our compliance requirements resulting from a legal obligation or any processing that may be required to protect against illegal activities.

#### **Right to be informed - Request to know**

Depending on the circumstances, you have a right to know:

whether we collect and use your personal information;

the categories of personal information that we collect;

the purposes for which the collected personal information is used;  
whether we sell your personal information to third parties;  
the categories of personal information that we sold or disclosed for a business purpose;  
the categories of third parties to whom the personal information was sold or disclosed for a business purpose; and  
the business or commercial purpose for collecting or selling personal information.

In accordance with applicable law, we are not obligated to provide or delete consumer information that is de-identified in response to a consumer request or to re-identify individual data to verify a consumer request.

### Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights

We will not discriminate against you if you exercise your privacy rights.

### Verification process

Upon receiving your request, we will need to verify your identity to determine you are the same person about whom we have the information in our system. These verification efforts require us to ask you to provide information so that we can match it with the information you have previously provided us. For instance, depending on the type of request you submit, we may ask you to provide certain information so that we can match the information you provide with the information we already have on file, or we may contact you through a communication method (e.g. phone or email) that you have previously provided to us. We may also use other verification methods as the circumstances dictate.

We will only use personal information provided in your request to verify your identity or authority to make the request. To the extent possible, we will avoid requesting additional information from you for the purposes of verification. If, however, if we cannot verify your identity from the information already maintained by us, we may request that you provide additional information for the purposes of verifying your identity, and for security or fraud-prevention purposes. We will delete such additionally provided information as soon as we finish verifying you.

### Other privacy rights

you may object to the processing of your personal data

you may request correction of your personal data if it is incorrect or no longer relevant, or ask to restrict the processing of the data

you can designate an authorized agent to make a request under the CCPA on your behalf. We may deny a request from an authorized agent that does not submit proof that they have been validly authorized to act on your behalf in accordance with the CCPA.

you may request to opt-out from future selling of your personal information to third parties. Upon receiving a request to opt-out, we will act upon the request as soon as feasibly possible, but no later than 15 days from the date of the request submission.

To exercise these rights, you can contact us by email at [support@pareto.ai](mailto:support@pareto.ai), or by referring to the contact details at the bottom of this document. If you have a complaint about how we handle your data, we would like to hear from you.

### **Financial Incentives**

"Financial incentive" means a program, benefit, or other offerings, including payments to consumers as compensation, for the disclosure, deletion, or sale of personal information.

The law permits financial incentives or a price or service difference if a business has calculated a good-faith estimate of the value of the consumer's data that forms the basis for offering the financial incentive or price or service difference, and if a description of the method the business used to calculate the value of the consumer's data.

We may decide to offer a financial incentive (e.g. price or service difference) in exchange for the retention of sale or consumer's personal information.

If we decide to offer a financial incentive, we will notify you of such financial incentive and explain the price difference, as well as material terms of the financial incentive or price of service difference, including categories of personal information that are implicated by the financial incentive or price or service difference.

If you choose to participate in the financial incentive you can withdraw from the financial incentive at any time by emailing us at [support@pareto.ai](mailto:support@pareto.ai), or by referring to the contact details at the bottom of this document.

## **14. 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 information.

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

If you have questions or comments about this notice, you may contact our Data Protection Officer (DPO), Phoebe Yao, by email at [phoebe@pareto.ai](mailto:phoebe@pareto.ai)

## **HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?**

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it in some circumstances. To request to review, update, or delete your personal information, please visit: [support@pareto.ai](mailto:support@pareto.ai). We will respond to your request within 30 days.