

## **Privacy Policy**

This Privacy Policy (“**Policy**”) governs the collection, use and disclosure of information that the Licensor receives as a result of licensing the Software Platform.

This Policy covers the source documents and data that the Usage Licensee shares with the Licensor through the Software Platform that is accessed by using the Licensor’s websites, including but not limited to [www.exdionedge.app](http://www.exdionedge.app), [www.exdionpod.ai](http://www.exdionpod.ai), [www.exdionedge.tech](http://www.exdionedge.tech) and [www.exdion.com](http://www.exdion.com) (“ExdionPOD Websites” or “Websites”) or the Licensor’s online, offline or mobile apps.

By using any of the Licensor’s Software Platform, the Usage Licensee consents to the Licensor’s collection, use and disclosure practices, and other activities as described in this Policy. The Usage Licensee’s use of Software Platform signifies that the Usage Licensee agrees with all terms of this Policy.

### **1. Information that is collected**

The Licensor collects the following information about the Usage Licensee:

#### **a) Usage Information**

As the Usage Licensee navigates the Websites in order to utilize the Software Platform, the Licensor may collect information through the use of commonly used information-gathering tools such as cookies and Web beacons. With it, the Licensor collects:

- Browser information (type and language);
- IP address;
- Open / Click-through tracking URL;
- The actions that the Usage Licensee takes on the Websites (such as the web pages viewed and the links clicked, and time spent);
- Referrer information;
- Event registrations

#### **b) Personal Information**

The Licensor may collect the following personal information and may gather some of this information from third party sources:

- First Name & Last Name

- Email Address
- Phone number
- Job Title
- IP Address: When the Usage Licensee uses the Software Platform, the Licensor automatically collects Internet Protocol (“IP”) address, the date and time of the login and logout sessions.
- Region

**c) Policy Information**

When the Usage Licensee uses the Software Platform, it is expected to securely upload Insurance Policy and source documents for the Policy Checking service. The Software Platform extracts various components of information from the uploaded documents in order to compare and identify variances.

**d) Subscription Information**

The Licensor will require the Usage Licensee to provide the following:

- Business Name
- Billing details such as Credit Card Number & PayPal
- Mailing Address
- Registered Username
- Support communication: If the Licensor communicates with the Usage Licensee to offer support through any medium (Phone, Chat, Email, & Messaging apps such as WhatsApp), the Licensor will collect and store the following information:
  - Chat Transcripts
  - Emails
  - Phone call logs

- Phone call recordings

**e) Support communication**

If the Usage Licensee avails support through any medium (Phone, Chat, Email, & Messaging apps such as WhatsApp) the Licensor will collect and store the following information.

- Chat Transcripts
- Emails
- Phone call logs
- Phone call recordings

**2. How the collected information is utilized**

The Licensor uses information for the following purposes:

**a) To provide the Usage Licensee with Policy Checking services**

All policy documents collected will be used solely for the purpose of the Policy Checking service. No source documents pertaining to a Policy will be retained by the Licensor beyond 21 (twenty-one) business days of generation of the variance summary. No resultant variance summary information will be retained by the Licensor beyond 21 (twenty-one) business days of generation of the variance summary, unless the Usage Licensee intends to seek Analytics on the variances offered by the Licensor as a separate service, paid or as free value add.

**b) To provide the Usage Licensee with information about the Licensor's products and services**

The Licensor uses the Usage Licensee's Website browsing patterns, registration information, contact information, telephone prospect information, billing information, email, and messaging information to provide the Usage Licensee with information including about the Licensor and its Services. This includes newsletters and other promotional communications about offers, promotions, rewards, events, and services. The Usage Licensee may unsubscribe from email notifications by clicking on the unsubscribe link that is provided in all email notifications or by sending an email to [support@exdionpod.com](mailto:support@exdionpod.com), or [ins\\_support@exdion.com](mailto:ins_support@exdion.com) The Usage Licensee cannot opt out of receiving transactional emails related to your account or use of the services.

**c) To improve the usefulness of the Licensor's messages**

The Licensor uses the Usage Licensee's click-through tracking data for various purposes, including to help the Licensor determine the Usage Licensee's interest in particular topics and measure the effectiveness of the customer communications. The Usage Licensee may grant/decline consent for this tracking by emailing at [support@exdionpod.com](mailto:support@exdionpod.com), or [ins\\_support@exdion.com](mailto:ins_support@exdion.com)

d) To respond to the Usage Licensee's requests

The Licensor uses the Usage Licensee's contact information and other information shared with the Licensor via email and over other channels like chat and phone to respond to the Usage Licensee's requests.

e) To process payments

The Licensor shall use credit card and PayPal information solely to process payment for the Usage Licensee and services, if any. The Licensor shall pass the Usage Licensee's billing information on to its billing partners including but not limited to Stripe or PayPal who store the Usage Licensee's information securely for future billing as authorized by the Licensor.

f) To improve the Website

The Licensor uses Website navigational information, IP address, browser type, browser language, referring URL, files accessed, errors generated, time zone, operating system and other visitor details collected in its log files to analyze trends, administer the Website, track the Usage Licensee's movements and to improve the Website. The Licensor links this automatically collected data to other information that it may collect about the Usage Licensee.

g) To improve products and services

The Usage Licensee's usage details such as time, frequency, duration, pattern of use, characteristics of documents, features used and the amount of storage used might be recorded by the Licensor and used to improve the Licensor's service.

The Licensor also uses the information for the following purposes with the Usage Licensee's consent:

- To administer promotions that the Usage Licensee has entered.
- To fulfill any other purpose as disclosed to the Usage Licensee and with the Usage Licensee's consent.

- The Licensor posts user testimonials/feedback on its Website. These testimonials may include names and other Personal Information and the Licensor shall acquire the Usage Licensee's permission prior to posting these on the Website. The Usage Licensee represents and warrants that (i) its testimonial/feedback does not contain confidential or proprietary information of the Usage Licensee or of third parties; (ii) the Licensor is not under any obligation of confidentiality, express or implied, with respect to the feedback; (iii) the Websites may have something similar to the testimonial/feedback already under consideration or in development; and (iv) the Usage Licensee are not entitled to any compensation or reimbursement of any kind from the Licensor for the feedback under any circumstances, unless specified.
- Collection and Use of Non-Personal Information. When the Usage Licensee is granted the log-in details, the Licensor may collect non-personal information/ data that does not permit direct association with any specific individual, such as the Usage Licensee's country and operating system. This information is used to help the Licensor improve its products and services.

### **3. How the collected information is shared**

The Licensor shares the Usage Licensee's information in the following manner:

The Licensor will not share or disclose the Usage Licensee's Personal Information to any person for any purpose that is not directly connected with providing the Software Platform to the Usage Licensee.

The Licensor may share generic aggregated demographic information not linked to any Personal Information. Such information could be Policy Variance Trends, Quality Patterns etc with the Licensor's business partners and clients on specific demand.

Please be aware that laws in various jurisdictions in which the Licensor operates may obligate it to disclose user information and the contents of the Usage Licensee's user account to the local law enforcement authorities under a legal process or an enforceable government request. In addition, the Licensor may also disclose Personal Information and contents of its user account to law enforcement authorities if such disclosure is determined to be necessary to protect the Licensor's rights, or for protecting the safety of its users, employees, or the general public.

In the event that the Licensor is involved in a bankruptcy, merger, acquisition, reorganization or sale of assets, the Usage Licensee's information will be transferred as

part of that transaction. This Policy will continue to apply to such information after transferring to the new entity.

**4. How the Licensor handles the Usage Licensee's Customer Data**

The Usage Licensee may electronically submit documents, data or information for processing purposes ("Customer Data"). The Licensor will not share, distribute, or reference any such Customer Data except as required to Usage Licensee/provide the Software Platform, or as may be required by law. The Licensor may access Customer Data only for the purpose of providing the Software Platform or any related services or preventing or addressing service or technical problems or as may be required by law.

**5. How the Licensor stores and secures information that it collects**

The Licensor operates on the secure Amazon Web Services Cloud. Strict administrative, technical, and physical procedures are in place to protect information stored in its servers. The Licensor uses industry-standard Secure Socket Layer (SSL) encryption technology to safeguard the account registration process and sign-up information. Other security safeguards include but are not limited to data encryption, firewalls, and physical access controls where required.

The Licensor implements a variety of security measures to maintain the safety of the Usage Licensee's information and data it stores in its account and to be compliant with regional PII and PHI requirements. In addition to using hashing, audit logs and secure - isolated document containers, the Licensor restricts access to the Usage Licensee's name and email address to the employees of the Licensor. Data stored in the Usage Licensee's account is only accessed by the Licensor's team when performing the support services.

All supplied sensitive/credit information is transmitted via Secure Socket Layer (SSL) technology and then encrypted into the Payment gateway providers database only to be accessible by those authorized with special access rights to such systems and are required to keep the information confidential. After a transaction, the Usage Licensee's private information (credit cards, social security numbers, financials, etc.) will not be stored on the Licensor's servers.

While the Licensor implements safeguards designed to protect the Usage Licensee's information, no security system is impenetrable and due to the inherent nature of the Internet, the Licensor cannot guarantee that documents and data, during transmission through the Internet or while stored on its systems or otherwise in its care, is safe from intrusion by others. The Licensor is covered by a reputed Insurer under a comprehensive Cyber Security Program.

If the Usage Licensee uses the Websites, responsibility for securing storage and access to the information that it submits rests with it and not the Licensor. The Licensor strongly recommends that server or data center users configure SSL to prevent interception of data transmitted over networks and to restrict access to the databases and other storage points used.

**6. How the Licensor transfers the Usage Licensee's personal information internationally**

Data that the Licensor collect during the Usage Licensee's sign-up, and during its use of the Software Platform/Websites, are stored on servers under the Licensor's control. To facilitate the Licensor's operations, it may transfer and access such information from around the world, including from other countries in which it has its operations and to offer support to users. Irrespective of which country the Usage Licensee resides in or supplies information from, by using the Licensor's Software Platform/Websites or related services, the Usage Licensee authorizes the Licensor to use the Usage Licensee's information in any country where the Licensor operates.

**7. Other important Privacy Information**

**a) Analytics**

The Licensor may analyze statistical and aggregate data about its Website's content and user base. This aggregated information is not personally identifiable and is employed in improving offerings and to provide industry benchmarking.

**b) Third Party Products and Services Links from our website**

The Website may contain links to, or content from, third party websites and other products and services. The Usage Licensee is advised to verify the privacy practices of such other websites. The Licensor is not responsible for the manner of use or misuse of information made available at such other websites. The Licensor encourages the Usage Licensee not to provide Personal Information, without being sure of the Privacy Policy Statement of other websites.

**c) Clear Gifs and Log Files**

The Licensor and its third-party partners use technologies such as web beacons in analyzing trends, administering the website, tracking users' movements around the site, and gathering demographic information about the user base as a whole. The Licensor may receive reports based on the use of these technologies by these companies on an individual and aggregated basis.

As is true of most websites, the Licensor gather certain information automatically and store it in log files. This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. The Licensor links this automatically-collected data to other information that it collects about the Usage Licensee.

**d) Do Not Track**

Do Not Track (“DNT”) is an optional browser setting that allows the Usage Licensee to express its preferences regarding tracking by advertisers and other third parties. The Licensor does not use technology that recognizes DNT signals from the Usage Licensee’s web browser.

**8. Changes to this Privacy Policy**

This Policy may be updated from time to time. If the Licensor makes changes, it will revise this Policy to reflect such changes and revise the effective date included at the beginning of this Policy. The Licensor may provide the Usage Licensee additional notice (to the e-mail address) if the changes are material. The Usage Licensee use of the Software Platform or any related service following any such notice will signify and constitute its assent to and acceptance of such revised Privacy Policy.