

# Pulcro.io Privacy Statement

This Privacy Statement explains how Pulcro.io LLC (“Pulcro.io”, “we” or “our”) and our affiliated companies (unless they have published their own privacy statement), collect, process, use, protect and share your personal information as well as your privacy rights under certain privacy laws and how you can exercise those rights.

## Overview of Our Privacy Practices

We have highlighted key details about our privacy practices in the table below:

Information We Collect About You	<p>We collect your personal information directly from you through your interactions, use, and experiences with our websites, products and services. We also obtain your information indirectly from our Business Partners and other third-party sources.</p> <p>“Business Partner” means any third party with whom we have a business relationship to assist us with: providing you with our products or services, processing and collecting your payments, tailoring content to your interests, sending you information or offers or performing other functions to support our relationship with you, including at times for purposes of credit and debt collection. For more information about the types and sources of information we collect about you refer to: Information We Collect About You - section.</p>
How We Use and Share Your Information	<p>We use your personal information for purposes such as:</p> <ul style="list-style-type: none"><li>• Providing you with our products and services and enhancing the quality of your customer support;</li><li>• Tailoring your customer experience. For example by making product or service recommendations to you</li><li>• Improving our products and services</li><li>• Complying with applicable laws.</li><li>• Improving the safety and security of our website, products and services. For example by detecting,</li></ul>

	<p>preventing, investigating and responding to risks that could harm you or Pulcro.io.</p> <p>We may share your personal information with our affiliated companies and Business Partners to perform functions such as assisting us with completing any transactions, sharing information about our products and services, or offering you our latest deals and promotions. For more information refer to: How We Use and Share Your Information – section.</p>
<p>Our Use of Cookies and Other Technologies</p>	<p>When you interact with Pulcro.io’s websites, online services, interactive applications, email messages or advertisements, we may use cookies and similar technologies to help us tailor your experience, better understand your preferences, tell us which parts of our websites you have visited, facilitate and measure the effectiveness of our interest-based advertisements and web searches. We also use web beacons to help deliver cookies and gather data about our site performance and user journeys to and on our website.</p> <p>Pulcro.io uses Google Workspace to facilitate application delivery. Google Workspace allows Pulcro.io to collect the business name, domains associated with the business, and the name and email address of its employees. This information is used to populate the organization’s profile and facilitates specific users’ experiences within the application.</p> <p>To learn more about how Pulcro.io uses cookies and to adjust your cookie preferences, please see Pulcro.io’s Cookie Notice.</p>
<p>Your Consumer Privacy Rights</p>	<p>You can exercise your privacy rights under applicable privacy laws (such as the California Consumer Privacy Act) concerning your personal information by emailing <a href="mailto:privacy@pulcro">privacy@pulcro</a>. Pulcro.io does not discriminate against customers who exercise their rights under applicable privacy laws.</p>

	<p>For more information about your privacy rights, please refer to: Your Consumer Privacy Rights - section.</p>
California Residents	<p>California residents can learn more about the categories of personal information we collect about you, and how we use it or share it with our Business Partners by reaching out to us at <a href="mailto:hello@pulcro.io">hello@pulcro.io</a>. Other than our use of online analytics and advertising activities, which could be construed as a “sale” of personal information under the California Consumer Privacy Act (“CCPA”) and as “sharing” under the California Privacy Rights Act (“CPRA”), we do not otherwise “sell” your personal information to unaffiliated third parties (for example, offline sharing of your contact or other data with unaffiliated third parties for their own marketing purposes).</p> <p>California residents have the right to opt out of sales or sharing of your personal information.</p> <p>Although we do not sell offline information to unaffiliated third parties, you may contact us at <a href="mailto:privacy@pulcro.io">privacy@pulcro.io</a> to be added to a California resident offline “opt out of sale” list that would be referenced should we ever consider doing so in the future.</p> <p>You can also click on the “Do Not Sell or Share My Personal Information” link at the bottom of our webpage to exercise your opt out rights, or you or your authorized agent may send a request by mail at our address listed below. For more information about the rights you have as a California resident and how Pulcro.io complies with the CCPA, refer to: California Residents - section.</p>
Colorado Consumers	<p>Consumers in the State of Colorado can learn more about the categories of personal information we collect about you and how we share it with our Business Partners by contacting us at <a href="mailto:hello@pulcro.io">hello@pulcro.io</a>. Other than our use of online analytics and advertising activities (which could be construed as a “sale” or</p>

	<p>sharing of personal information under certain California laws, but at this time not under Colorado law), we do not otherwise “sell” your personal information to other third parties (for example, our Business Partners). You have the right to direct Pulcro.io not to sell your information as well as the right to opt out of any use or other processing of personal information for the purposes of targeted advertising. For more information about the rights you have as a consumer in the State of Colorado and how Pulcro.io complies with the Colorado Privacy Act (“CPA”), refer to Colorado Consumers below.</p>
Connecticut Consumers	<p>The Connecticut Data Privacy Act (“CTDPA”) gives Connecticut residents certain rights over their personal information and establishes responsibilities and privacy protection standards for data controllers that process personal data. You have the right to direct Pulcro.io not to sell your information. For more information about the rights you have as a Connecticut resident and how Pulcro.io complies with the CCPA, refer to Connecticut Residents.</p>
Virginia Consumers	<p>Consumers in the Commonwealth of Virginia can learn more about the categories of personal information we collect about you, and how we use or share it with our Business Partners by contact us at <a href="mailto:hello@pulcro.io">hello@pulcro.io</a>. Other than our use of online analytics and advertising activities (which could be construed as a “sale” or sharing of personal information under certain California laws, but at this time not under Virginia law), we do not otherwise “sell” your personal information to other third parties (for example, our Business Partners). You have the right to direct Pulcro.io not to sell your information. For more information about the rights you have as a consumer in the Commonwealth of Virginia and how Pulcro.io complies with the Virginia Consumer Data Protection Act (“VCDPA”), refer to Virginia Consumers below.</p>

Your Marketing Choices	You can make choices about how Pulcro.io reaches you with marketing offers or utilizes interest based advertising, as well as customize your general communication preferences, at any time by emailing your requests to <a href="mailto:privacy@pulcro.io">privacy@pulcro.io</a> You may also view Pulcro.io’s Cookie Notice, which outlines your choices about personalized advertising. For more information about your choices refer to: Your Marketing Choices and Our Use of Cookies and Other Technologies below.
Contact Us	<p>For other privacy questions, issues, concerns or complaints, please email us at <a href="mailto:privacy@pulcro.io">privacy@pulcro.io</a> or write to us at:</p> <p>Pulcro.io LLC  Attention: Pulcro.io’s Privacy Office  551 S IH 35, Suite 300  Round Rock, Texas 78664, USA</p>
Changes to This Privacy Statement	We may make changes to this Privacy Statement from time to time. If there are material changes to the Privacy Statement, we will revise the “last updated” date at the bottom of this statement. We encourage you to periodically review this Privacy Statement to learn how Pulcro.io is protecting your personal information.

**Information We Collect About You**

The types of information we collect about you depends on your use of our products, services and the ways you interact with us. This may include information about:

- How you use or visit our websites, accounts with Pulcro.io or applications.
- How you use our services and products and interact with us.
- Contact, billing and other information you provide.
- Improving and developing our products and services.
- Personalizing and recommending our products and services.

- Advertising and marketing to you, including sending promotional communications, targeting advertising and presenting you with relevant offers.

We also obtain information from third-party sources. We protect information obtained from third parties according to the privacy practices as described in this Privacy Statement.

These third-party sources can change, and may include:

- Data brokers from which we purchase demographic data to supplement the information we collected about you.
- Communication services, including email providers and social networks, when you give permission to access your information on such third-party services or networks.
- Partners with which we offer co-branded products or services, or engage in joint-marketing activities.
- Publicly available sources such as open government databases.

The personal information we collect can include the following:

- **Contact details** such as your name, email address, mailing address and telephone numbers.
- **Employment information** such as your job title and other business or company information.
- **Credentials** such as your passwords, password hints and similar security information used for authentication and access.
- **Demographic information** such as your age, gender, country, interests and preferences.
- **Web form information you provide** in our web forms (forms you choose to complete will indicate whether the data requested is mandatory or voluntary).
- **Payment information** to process payments, such as a credit card number and associated security code.
- **Account history information** related to products or services you purchase and activities associated with your account.
- **Cookie and tracking information** such as IP address, device identifier, location data, browser type and language, access times, the Uniform Resource Locator (URL), other unique identifiers and technical data that may uniquely identify your device, system or browser.
- **Browser history information** about the websites you visit.
- **Error reports and performance information** of the products and any problems you experience, including error reports.

- **Troubleshooting and help information** when you contact Pulcro.io to make a purchase or for technical support or customer support services, phone conversations or chat sessions with our representatives which may be monitored and recorded.
- **Content consumption information** about media content (e.g. T.V., apps and games) you access through our products.
- **Feedback and rating information** you provide to us such as customer survey feedback and product reviews you write.
- **Workspace location information.**

### **How We Use and Share Your Information**

We use and share your information to:

- Create, deliver and maintain our products and services.
- Establish and maintain your account.
- Measure credit and payment risk.
- Provide account related services and information.
- Help you with customer service and technical support issues or questions.
- Help us improve and personalize our products and services.
- Provide you with marketing and promotional communications and deliver targeted and relevant advertising and relevant offers to you, which includes making better predictions about content and marketing offers that may interest you.
- Administer our Pulcro.io KernelCoins rewards program.
- Authenticate your identity.
- Detect and prevent fraud.
- Manage and protect our networks, services and customers.
- Meet our legal obligations and conduct research.

### **Your Consumer Privacy Rights**

Consumer privacy rights vary depending on where you reside, but Pulcro.io will make reasonable efforts to honor your request even if you are a resident of a country or state that does not require us to do so under applicable law. You may have the following consumer privacy rights under applicable state laws:

- **Right to Know:** you may have the right to request information about the personal information we have collected about you and for what purpose.

- **Right to Access:** you may have the right to request information about how we process your personal information and to obtain a copy of that personal information.
- **Right to Portability:** you may have the right to receive your personal information, in a structured, commonly used, and machine-readable format and to have that information transmitted to another organization in certain circumstances.
- **Right to Deletion:** you may have the right to request the deletion of your personal information that we have collected from you.
- **Right to Be Free from Discrimination:** Pulcro.io will not discriminate against you for exercising your consumer privacy rights.
- **Right to Opt-out of Sharing:** you may have the right to opt out of Pulcro.io sharing your personal information with third parties for some purposes, including sharing that may be defined as a sale under certain laws.
- **Right to Make Choices About Email Marketing:** you may have the right to make choices about receiving email marketing.

Please keep in mind that we may not be able to honor all requests, such as if the information is required to process your payments or returns, to fulfill your order, or to comply with tax, audit, or other regulatory requirements. Please refer to Submitting Access or Deletion Requests to learn how to submit a request.

California residents can also turn on the Global Privacy Control (GPC) to opt out of the “sale” or sharing of your personal information for each participating browser system that you use or can click on the “Do Not Sell or Share My Personal Information” link at the bottom of our webpage for other options. Learn more at the Global Privacy Control website (link: <https://globalprivacycontrol.org/>). Please keep in mind that these opt-out tools are limited to the device and web browser you are using because they work off your device ID or browser ID. If you use another device or browser, you will need to opt-out on each device and browser. If you block or clear cookies from your browser, it may remove the opt-out settings, requiring you to opt-out again.

### **California Residents**

The California Consumer Privacy Act (“CCPA”) grants California residents certain rights regarding the personal information that businesses have about them. These include (a) the right to know about personal information categories the business collected about you in the prior 12 months, the source of such information, the purpose for collecting the information and the specific information collected about you (this information is available in our Supplementary Disclosures upon request); (b) the right to request access or deletion of your personal information, (c) the right to request correction of your personal



information as well as (e) the right to direct a business to stop selling your personal information. While Pulcro.io does not sell personal information to third parties for monetary consideration, the CCPA broadly defined “sale” and the certain data collected on our sites by third parties for interest-based advertising purposes may have been considered a “sale” under the CCPA, and would be considered sharing under the California Privacy Rights Act (“CPRA”). Pulcro.io may be categorized as a “Service Provider” under the CCPA in certain cases, such as in providing products and services to our customers. In other cases, Pulcro.io may be categorized as a business, such as in our day to day operations. The categories of third parties to whom personal information is disclosed include advertisers and marketing partners and data analytics providers. The categories of information we may share with such parties may include device information and identifiers, such as IP address, and unique advertising identifiers and cookies; usage information, such as browsing history; location information, such as city; and inference data. To opt out, please contact us at [privacy@pulcro.io](mailto:privacy@pulcro.io), or you or an authorized agent acting on your behalf (subject to our verification of the identity and legal authority associated with such request as required by law) can also send your request to us at:

Pulcro.io LLC  
Attention: Privacy Office  
551 S IH 35, Suite 300  
Round Rock, Texas, 78664, USA

California residents can also turn on the Global Privacy Control (GPC) to opt out of the “sale” or sharing of your personal information for each participating browser system that you use. Learn more at the Global Privacy Control website (link: <https://globalprivacycontrol.org/>).

### **Colorado Consumers**

The Colorado Privacy Act (“CPA”) grants consumers that are residents of the State of Colorado certain rights provided by C.R.S. § 6-1-1-1306 regarding the personal information businesses have about them, subject to certain limitations. These rights are listed in more detail below, and at this time do not extend to individuals acting in commercial or employment contexts.

**The Right of Access:** Consumers have the right to confirm the processing of their personal data and to access their personal information, and obtain a copy of it in a readily useable format (to the extent “technically feasible”);

**The Right to Correct Inaccuracies:** Consumers may request that inaccuracies in their personal information are corrected, considering the nature of the data and the business' purposes in using it;

**The right to Deletion:** Consumers have the right to delete personal information concerning the consumer;

**The Right to Data Portability:** Consumers have the right to obtain a copy of their data from the controller (Pulcro.io) in a portable and, to the extent technically feasible, readily usable format that allows the consumer to transmit the data to another entity up to twice per year;

**The Right to Opt-Out:** Consumers have the right to opt out of several different uses of their personal information, including: targeted advertising, sale of their personal information, and profiling for the purpose of making decisions with legal or similarly significant effects concerning the consumers. Please note that Pulcro.io does not sell your personal information as defined by the CPA. To opt out of targeted advertising online, please adjust your cookies settings to reject marketing cookies as described in Pulcro.io's Cookie Notice. For other opt-outs or requests, please contact us at [privacy@pulcro.io](mailto:privacy@pulcro.io) or write to us at:

Pulcro.io LLC  
Attention: Privacy Office  
551 S IH 35, Suite 300  
Round Rock, Texas, 78664, USA

The categories of third parties to whom personal information is disclosed include advertisers and marketing partners and data analytics providers. The categories of information we may share with such parties may include device information and identifiers, such as IP address, and unique advertising identifiers and cookies; usage information, such as browsing history; location information, such as city; and inference data. To opt out, please email us at [privacy@pulcro.io](mailto:privacy@pulcro.io), or you or an authorized agent acting on your behalf (subject to our verification of the identity and legal authority associated with such request as required by law) can also send your request to us at:

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- Colorado residents can also turn on the Global Privacy Control (GPC) to opt out of the "sale" or sharing of your personal information for each participating browser system that you use. Learn more at the Global Privacy Control website.

- A Colorado resident may also designate another person to act on their behalf as their authorized agent with respect to these rights. We will seek to authenticate that someone claiming to be an authorized agent on behalf of another is in fact an authorized agent for that individual. While this may vary on a case by case basis, some ways we may seek to authenticate an authorized agent is by requesting a power of attorney or other legal document that reflects this relationship.
- Colorado residents may appeal Pulcro.io's response to their requests by sending an email to [privacy@pulcro.io](mailto:privacy@pulcro.io) or by contacting us at our address noted above.

### **Connecticut Residents**

The Connecticut Data Privacy Act or ("CTDPA") provides Connecticut residents with certain rights. At this time, it does not apply to employees or to business to business relationships. Connecticut residents the following rights:

- The right to access personal data that a controller has collected about them.
- The right to correct inaccuracies in their personal data.
- The right to delete their personal data, including personal data that a controller collected through third parties.
- The right to obtain a copy of their personal data in a portable and readily usable format that allows them to transfer the data to another controller with ease.
- The right to opt-out of:
  - the sale of their personal data;
  - the processing of personal data for the purposes of targeted advertising; and
  - profiling that may have a legal or other significant impact.

A Connecticut resident may also designate another person to act on their behalf with respect to these rights.

Please note that Pulcro.io does not sell your personal information as defined by the CTDPA. To opt out of targeted advertising online, please adjust your cookies settings to reject marketing cookies as described in Pulcro.io's Cookie Notice. For other opt-outs or requests, please contact us at [privacy@Pulcro.io.com](mailto:privacy@Pulcro.io.com) or write to us at:

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Attention: Privacy Office  
551 S IH 35, Suite 300  
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The categories of third parties to whom personal information is disclosed include advertisers and marketing partners and data analytics providers. The categories of

information we may share with such parties may include device information and identifiers, such as IP address, and unique advertising identifiers and cookies; usage information, such as browsing history; location information, such as city; and inference data. To opt out, please contact us at [privacy@pulcro.io](mailto:privacy@pulcro.io), or you or an authorized agent acting on your behalf (subject to our verification of the identity and legal authority associated with such request as required by law) can also send your request to us at:

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Attention: Privacy Office  
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Round Rock, Texas, 78664, USA

Connecticut residents can also turn on the Global Privacy Control (GPC) to opt out of the “sale” or sharing of your personal information for each participating browser system that you use. Learn more at the Global Privacy Control website.

### **Virginia Consumers**

The Virginia Consumer Data Protection Act (“VCDPA”) grants consumers that are residents of the Commonwealth of Virginia certain rights regarding the personal information businesses have about them, subject to certain limitations. These rights are listed in more detail below, and at this time do not extend to individuals acting in commercial or employment contexts.

- **The Right to Know:** Consumers have the right to know whether or not a business processes their personal information;
- **The Right of Access:** Consumers have the right to access their personal information, and obtain a copy of it in a readily useable format (to the extent “technically feasible”);
- **The Right to Correct Inaccuracies:** Consumers may request that inaccuracies in their personal information are corrected, considering the nature of the data and the business’ purposes in using it;
- **The Right to Data Portability:** Consumers have the right to obtain a copy of their data from the controller (Pulcro.io) in a portable and, to the extent technically feasible, readily usable format that allows the consumer to transmit the data to another controller;
- **The Right to Opt-Out:** Consumers have the right to opt out of several different uses of their personal information, including: targeted advertising, sale of their personal information and profiling for the purpose of making decisions with legal or similarly significant effects concerning the consumers. Please note that Pulcro.io does not

sell your personal information as defined by the VCDPA. To opt out of targeted advertising online, please adjust your cookies settings to reject marketing cookies as described in Pulcro.io's Cookie Notice. For other opt-outs or requests, please contact us at [privacy@pulcro.io](mailto:privacy@pulcro.io) or write to us at:

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Round Rock, Texas, 78664, USA

### **Submitting Access or Deletion Requests**

If you would like to access a copy of, or request deletion of the personal information we may maintain about you, or to exercise any other privacy right as set out above, you may do so by:

Sending a written request via email to [privacy@pulcro.io](mailto:privacy@pulcro.io); or

Writing to us at:

Pulcro.io LLC  
Attention: Privacy Office  
551 S IH 35, Suite 300  
Round Rock, Texas, 78664, USA

Pulcro.io requires the following information to authenticate you no matter which method you use to make your request:

- First name
- Last name
- Email address

If you are an agent acting on behalf of someone else, please note that in addition to the information noted above, we will also ask for a copy of your Power of Attorney.

Please be aware that your request does not guarantee complete access or comprehensive removal as the law may not permit or require removal in certain circumstances.

### **Your Marketing Choices**

You have choices about how we reach you with marketing offers and about other uses of your information. To update your preferences, you can email us at [privacy@pulcro.io](mailto:privacy@pulcro.io) or click "unsubscribe" in any email marketing communications we send you.

Please be aware that it may take up to 10 business days for your email preferences to take effect.

### **How We Secure Your Information**

We use appropriate technical, organizational, and physical data security safeguards to help protect against unauthorized access to, use or disclosure of your personal information, such as:

- Using encryption when collecting or transferring sensitive information, such as credit card details.
- Designing our data security safeguards to ensure the ongoing security, integrity, availability and resilience of processing systems and services.
- Limiting physical access to our premises.
- Limiting access to the information we collect about you.
- Ensuring that our Business Partners have appropriate safeguards in place to help protect your personal information.
- As required by law, destroying or de-identifying personal information.

We encourage you to keep any passwords you use confidential and to be careful to avoid “phishing” scams where someone may send you an email that appears to be from Pulcro.io asking for your personal information. Pulcro.io will not request your ID or password through email.

### **Collection and Use of Children's Information**

We understand the importance of taking extra precautions to protect the privacy and safety of children using our products, services or our websites. Children under the age of 16 or equivalent minimum age under applicable law, must not share their personal information unless their parent or guardian provides verifiable consent. If at any time a parent or guardian needs to access or delete data associated with their child’s or guardian’s account, they may contact us through one of the options provided in this Privacy Statement. Pulcro.io does not sell the personal information of minors under the age of 18.

### **Links to Third-Party Websites and Services**

We may sometimes provide links directing you to websites operated by third parties. Those websites may also collect your personal information, subject to the third party’s information practices as outlined in their privacy statements. Pulcro.io does not operate these websites and is not responsible for their information practices. We encourage you to review privacy statements on any third party website before providing any personal information.

## **Contact Us**

If you would like to exercise your privacy rights or have a privacy question, concern or complaint, please contact us at [privacy@pulcro.io](mailto:privacy@pulcro.io) or write to us at:

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Attention: Privacy Office  
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