



# Privacy Policy

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Effective Date **August 26, 2026**

Last Updated **August 26, 2026**

Questions? You can reach us at [privacy@polly.ai](mailto:privacy@polly.ai)

This Privacy Policy describes how Subcurrent Inc. (referred to as "Polly") collects, uses and discloses information, and what choices you have with respect to the information.

We periodically update this Privacy Policy as our Services evolve. This version includes updates regarding connected collaboration platforms, optional AI-enabled integrations, data retention, U.S. state privacy rights, and related privacy disclosures.

In addition, we have worked to make the Privacy Policy clearer and more understandable by:

- organizing it into the sections listed in the Table of Contents below,
- providing a series of examples that help illustrate how the policies may be implemented by Polly, and
- defining and capitalizing a few terms that are used more than once for simplicity and brevity.

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This Privacy Policy covers the information we collect about you when you use our products or services, or otherwise interact with us (for example, by attending our events), unless a different policy is displayed. Polly, we and us refers to Subcurrent, Inc. and any of our corporate affiliates. We offer a range of online productivity software across various platforms. We refer to all of these products, together with our other services and websites as "Services" in this policy.

This policy also explains your choices about how we use information about you. Your choices include how you can object to certain uses of information about you and how you can access and update certain information about you. If you do not agree with this policy, do not access or use our Services or interact with any other aspect of our business.

Where we provide the Services under contract with an organization (for example your employer) that organization controls the information processed by the Services. For more information, please see Notice to End Users below.

# What information we collect about you

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We collect information about you when you provide it to us, when you use our Services, and when other sources provide it to us, as further described below.

## Information you provide to us

We collect information about you when you input it into the Services or otherwise provide it directly to us.

**Account and Profile Information:** We collect information about you when you modify your profile, set preferences or make purchases through the Services. For example, you provide your contact information and, in some cases, billing information when you pay for the Services. You also have the option of updating settings like Platform administrators. We keep track of your preferences when you select settings within the Services.

**Content you provide through our products:** The Services include the Polly products you use, where we collect and store content that you post, send, receive and share. This content includes any information about you that you may choose to include. Examples of content we collect and store include: the title of polls and surveys created and the audience you are sending them to. Content also includes the files and links you upload to the Services.

**Content you provide through our websites:** The Services also include our websites owned or operated by us. We collect other content that you submit to these websites, which include social media or social networking websites operated by us. For example, you provide content to us when you provide feedback or when you participate in any interactive features, surveys, contests, promotions, sweepstakes, activities or events.

**Information you provide through our support channels:** The Services also include our customer support, where you may choose to submit information regarding a problem you are experiencing with a Service. Whether you designate yourself as a technical contact, open a support ticket, speak to one of our representatives directly or otherwise engage with our support team, you will be asked to provide contact information, a summary of the problem you are experiencing, and any other documentation, screenshots or information that would be helpful in resolving the issue.

**Payment Information:** We collect certain payment and billing information when you register for certain paid Services. For example, we ask you to designate a billing representative, including name and contact information, upon choosing a paid offering. You might also provide payment information, such as payment card details, which we collect via secure payment processing services.

## Information we collect automatically when you use the Services

We collect information about you when you use our Services, including browsing our websites and taking certain actions within the Services.

**Your use of the Services:** We keep track of certain information about you when you visit and interact with any of our Services. This information includes the features you use; the links you click on; the type, size and filenames of attachments you upload to the Services; frequently used search terms; and how you interact with others on the Services. We also collect information about the teams and people you work with and how you work with them, like who you collaborate with.

**Device and Connection Information:** We collect information about your computer, phone, tablet, or other devices you use to access the Services. This device information includes your connection type and settings when you install, access, update, or use our Services. We also collect information through your device about your operating system, browser type, IP address, URLs of referring/exit pages, device identifiers, and crash data. We use your IP address and/or country preference in order to approximate your location to provide you with a better Service experience. How much of this information we collect depends on the type and settings of the device you use to access the Services.

**Cookies and Other Tracking Technologies:** Polly and our third-party partners, such as our advertising and analytics partners, use cookies and other tracking technologies (e.g., web beacons, device identifiers and pixels) to provide functionality and to recognize you across different Services and devices. For more information, please see our Cookie Policy, which includes information on how to control or opt out of these cookies and tracking technologies.

## **Information we receive from other sources**

We receive information about you from other Service users, from third-party services, from our related companies, and from our business and channel partners.

**Information through hosting Platforms:** We provide Services that integrate with third-party collaboration platforms such as Slack or Microsoft Teams (collectively, "Platforms"). When you or your organization's administrator connects Polly to a Platform, Polly requests permissions needed to provide the features you choose to enable. Depending on the Platform, features enabled, and permissions approved by you or your administrator, Polly may receive account and profile information, workspace or organization information, channel or conversation metadata, and content necessary to provide the requested Services. Polly's access is limited by the permissions granted through the applicable Platform and by Polly's product authorization controls. For a list of currently supported Platforms and links to their respective policies and help documents, see the Platform Information page.

**Other users of the Services:** Other users of our Services may provide information about you when they submit content through the Services. For example, you may be mentioned in a Polly poll created by someone else. Similarly, an administrator may provide your user name when they designate you as the billing or technical contact on your company's account.

**Other services you link to your account:** We receive information about you when you or your administrator integrate or link a third-party service with our Services. For example, if you create an account or log into the Services using your Google credentials, we receive your name and email address as permitted by your Google profile settings in order to authenticate you. You or your administrator may also integrate our Services with other services you use, such as to allow you to access, store, share and edit certain content from a third-party through our Services. For example, you may authorize our Services

to access, display and store files from a third-party document-sharing service within the Services interface. Or you may authorize our Services to connect with a third-party calendaring service so that your meetings and connections are available to you through the Services. You may authorize our Services to sync a contact list or address book so that you can easily connect with those contacts within the Services or invite them to collaborate with you on our Services. The information we receive when you link or integrate our Services with a third-party service depends on the settings, permissions and privacy policy controlled by that third-party service. You should always check the privacy settings and notices in these third-party services to understand what data may be disclosed to us or shared with our Services.

**Polly Partners:** We work with partners who provide consulting, implementation, training and other services around our products. Some of these partners also help us to market and promote our products, generate leads for us, and resell our products. We receive information from these partners, such as billing information, billing and technical contact information, company name, what Polly products you have purchased or may be interested in, evaluation information you have provided, what events you have attended, and what country you are in.

**Other Partners:** We receive information about you and your activities on and off the Services from third-party partners, such as advertising and market research partners who provide us with information about your interest in and engagement with, our Services and online advertisements.

## How we use information we collect

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How we use the information we collect depends in part on which Services you use, how you use them, and any preferences you have communicated to us. Below are the specific purposes for which we use the information we collect about you.

**To provide the Services and personalize your experience:** We use information about you to provide the Services to you, including to process transactions with you, authenticate you when you log in, provide customer support, and operate and maintain the Services. For example, we use the name and picture you provide in your account to identify you to other Service users. Our Services also include tailored features that personalize your experience, enhance your productivity, and improve your ability to collaborate effectively with others by automatically analyzing the activities of your team to provide search results, activity feeds, notifications, connections and recommendations that are most relevant for you and your team. For example, we may use your stated job title and activity to return search results we think are relevant to your job function. We also use information about you to connect you with other team members seeking your subject matter expertise. We may use your email domain to infer your affiliation with a particular organization or industry to personalize the content and experience you receive on our websites.

**For research and development:** We are always looking for ways to make our Services smarter, faster, secure, integrated, and useful to you. We use collective learnings about how people use our Services and feedback provided directly to us to troubleshoot and to identify trends, usage, activity patterns and areas for integration and improvement of the Services. For example, to improve the audience select feature, we may automatically analyze recent interactions among users and how often they select certain audience. We automatically analyze and aggregate frequently used search terms to improve the accuracy and relevance of suggested topics that auto-populate when you create new content. In some cases, we apply these learnings across our Services to improve and develop similar features or to better integrate the services you use. We also test and analyze certain new features with some users before rolling the feature out to all users.

**AI and machine-learning features:** Polly may use AI or machine-learning technologies to provide features such as generating, summarizing, retrieving, organizing, or analyzing content at a user's direction. Polly does not use Customer Content to train large language models (LLMs). Where third-party AI service providers process information on Polly's behalf to provide AI-enabled features, those providers are subject to applicable contractual and security requirements.

**To communicate with you about the Services:** We use your contact information to send transactional communications via email and within the Services, including confirming your purchases, reminding you of subscription expirations, responding to your comments, questions and requests, providing customer support, and sending you technical notices, updates, security alerts, and administrative messages. We also send you communications as you onboard to a particular Service to help you become more proficient in using that Service. These communications are part of the Services and in most cases you cannot opt out of them. If an opt out is available, you will find that option within the communication itself or in your account settings.

**To market, promote and drive engagement with the Services:** We use your contact information and information about how you use the Services to send promotional communications that may be of specific interest to you, including by email and by displaying Polly ads on other companies' websites and applications, as well as on platforms like Facebook and Google. These communications are aimed at driving engagement and maximizing what you get out of the Services, including information about new features, survey requests, newsletters, and events we think may be of interest to you. We also communicate with you about new product offers, promotions and contests. You can control whether you receive these communications as described below under "Opt-out of communications."

**Customer support:** We use your information to resolve technical issues you encounter, to respond to your requests for assistance, to analyze crash information, and to repair and improve the Services.

**For safety and security:** We use information about you and your Service use to verify accounts and activity, to monitor suspicious or fraudulent activity and to identify violations of Service policies.

**To protect our legitimate business interests and legal rights:** Where required by law or where we believe it is necessary to protect our legal rights, interests and the interests of others, we use information about you in connection with legal claims, compliance, regulatory, and audit functions, and disclosures in connection with the acquisition, merger or sale of a business.

**With your consent:** We use information about you where you have given us consent to do so for a specific purpose not listed above. For example, we may publish testimonials or featured customer stories to promote the Services, with your permission.

## How we share information we collect

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We make collaborative tools, and we want them to work well for you. This means sharing information through the Services and with certain third parties. We share information we collect about you in the ways discussed below, including in connection with possible business transfers, but we are not in the business of selling information about you to advertisers or other third parties.

### Sharing with other Service users

When you use the Services, we share certain information about you with other Service users.

**For collaboration:** You can create content, which may contain information about you, and grant permission to others to see, share, edit, copy and download that content based on settings you or your administrator (if applicable) select. Some of the collaboration features of the Services display some or all of your profile information to other Service users when you share or interact with specific content. For example, when you comment on a Polly poll, we may display your profile picture and name next to your comments so that other users with access to the page or issue understand who made the comment.

**Managed accounts and administrators:** If you register or access the Services using an email address with a domain that is owned by your employer or organization, and such organization wishes to establish an account or site, certain information about you including your name, profile picture, contact info, content and past use of your account may become accessible to that organization's administrator and other Service users sharing the same domain. If you are an administrator for a particular site or group of users within the Services, we may share your contact information with current or past Service users, for the purpose of facilitating Service-related requests.

**Community Forums:** Our websites offer publicly accessible blogs, forums, and issue trackers. You should be aware that any information you provide on these websites — including profile information associated with the account you use to post the information — may be read, collected, and used by any member of the public who accesses these websites. Your posts and certain profile information may remain even after you terminate your account. We urge you to consider the sensitivity of any information you input into these Services. To request removal of your information from publicly accessible websites operated by us, please contact us as provided below. In some cases, we may not be able to remove your information, in which case we will let you know if we are unable to and why.

### Sharing with third parties

We share information with third parties that help us operate, provide, improve, integrate, customize, support and market our Services.

**Service Providers:** We work with third-party service providers to provide website and application development, hosting, maintenance, backup, storage, virtual infrastructure, payment processing, analysis and other services for us, which may require them to access or use information about you. If a service

provider needs to access information about you to perform services on our behalf, they do so under close instruction from us, including policies and procedures designed to protect your information. For a current list of third party sub-processors, see <https://www.polly.ai/subprocessors>.

**Polly Partners:** We work with third parties who provide consulting, sales, and technical services to deliver and implement customer solutions around the Services. We may share your information with these third parties in connection with their services, such as to assist with billing and collections, to provide localized support, and to provide customizations. We may also share information with these third parties where you have agreed to that sharing.

**Third Party Apps:** You, your administrator or other Service users may choose to add new functionality or change the behavior of the Services by installing third party apps (like Google Calendar) or by connecting AI assistants within the Services. Doing so may give third-party apps access to your account and information about you like your name and email address, and any content you choose to use in connection with those apps. Third-party app policies and procedures are not controlled by us, and this privacy policy does not cover how third-party apps use your information. We encourage you to review the privacy policies of third parties before connecting to or using their applications or services to learn more about their privacy and information handling practices. If you object to information about you being shared with these third parties, please uninstall the app.

**AI Assistants and AI-Enabled Integrations:** Polly may offer AI-enabled features and integrations as part of the Services. Availability and default settings may vary by plan, product, workspace, or organization configuration. For certain free and self-service offerings, some AI-enabled features may be available or enabled by default, subject to applicable settings and controls. For Enterprise customers, AI-enabled features are disabled by default unless enabled by an authorized administrator or as otherwise agreed with the customer. AI-enabled features that are available or enabled by default process content when a user chooses to use the applicable feature; availability of an AI feature does not mean that all Customer Content is automatically submitted to an AI provider.

Separately, Polly may allow you or your organization's administrator to connect supported third-party AI assistants or AI-enabled services to Polly. These third-party connections require authorization by the applicable user or administrator. When an AI integration is connected, the information it can retrieve or act on is governed by the permissions associated with the connected account, the tools and features Polly makes available to the integration, and applicable organization settings. A connected AI assistant may help an authorized user create, update, close, manage, summarize, retrieve, or organize Polly content within the capabilities Polly makes available to that integration. When information is transmitted to a connected AI provider at your or your administrator's direction, that provider's processing of the information is also subject to its applicable terms and privacy practices. Polly does not control the independent privacy practices of AI providers that you choose to connect. We encourage you and your organization to review the applicable provider's privacy and data-handling practices before enabling an integration.

**Links to Third Party Sites:** The Services may include links that direct you to other websites or services whose privacy practices may differ from ours. If you submit information to any of those third party sites, your information is governed by their privacy policies, not this one. We encourage you to carefully read the privacy policy of any website you visit.

**Social Media Widgets:** The Services may include links that direct you to other websites or services whose privacy practices may differ from ours. Your use of and any information you submit to any of those third-party sites is governed by their privacy policies, not this one.

**Third-Party Widgets:** Some of our Services contain widgets and social media features, such as the Twitter "tweet" button. These widgets and features collect your IP address, which page you are visiting on the Services, and may set a cookie to enable the feature to function properly. Widgets and social media features are either hosted by a third party or hosted directly on our Services. Your interactions with these features are governed by the privacy policy of the company providing it.

**With your consent:** We share information about you with third parties when you give us consent to do so. For example, we often display personal testimonials of satisfied customers on our public websites. With your consent, we may post your name alongside the testimonial.

**Compliance with Enforcement Requests and Applicable Laws; Enforcement of Our Rights:** In exceptional circumstances, we may share information about you with a third party if we believe that sharing is reasonably necessary to (a) comply with any applicable law, regulation, legal process or governmental request, including to meet national security requirements, (b) enforce our agreements, policies and terms of service, (c) protect the security or integrity of our products and services, (d) protect Polly, our customers or the public from harm or illegal activities, or (e) respond to an emergency which we believe in good faith requires us to disclose information to assist in preventing the death or serious bodily injury of any person.

**Business Transfers:** We may share or transfer information we collect under this privacy policy in connection with any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

# How we store and secure information we collect

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## Information storage and security

We use data hosting service providers in the United States to host the information we collect, and we use technical measures to secure your data.

While we implement safeguards designed to protect your information, no security system is impenetrable and due to the inherent nature of the Internet, we cannot guarantee that data, during transmission through the Internet or while stored on our systems or otherwise in our care, is absolutely safe from intrusion by others. For more details, see the Security page.

## How long we keep information

How long we keep information we collect about you depends on the type of information, as described in further detail below. After such time, we will either delete or anonymize your information or, if this is not possible (for example, because the information has been stored in backup archives), then we will securely store your information and isolate it from any further use until deletion is possible.

**Account information:** We retain your account information for as long as your account is active and a reasonable period thereafter in case you decide to re-activate the Services. We also retain some of your information as necessary to comply with our legal obligations, to resolve disputes, to enforce our agreements, to support business operations, and to continue to develop and improve our Services. Where we retain information for Service improvement and development, we take steps to eliminate information that directly identifies you, and we only use the information to uncover collective insights about the use of our Services, not to specifically analyze personal characteristics about you.

**Information you share on the Services:** If your account is deactivated or disabled, some of your information and the content you have provided will remain in order to allow your team members or other users to make full use of the Services. For example, we continue to display votes you sent to the users that received them and continue to display content you provided.

**Managed accounts:** If the Services are made available to you through an organization (e.g., your employer), we retain your information as long as required by the administrator of your account. For more information, see "Managed accounts and administrators" above.

**Marketing information:** If you have elected to receive marketing emails from us, we retain information about your marketing preferences for a reasonable period of time from the date you last expressed interest in our Services, such as when you last opened an email from us or ceased using your Polly account. We retain information derived from cookies and other tracking technologies for a reasonable period of time from the date such information was created.

## How to access and control your information

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You have certain choices available to you when it comes to your information. Below is a summary of those choices, how to exercise them and any limitations.

### Your Choices

You have the right to request a copy of your information, to object to our use of your information (including for marketing purposes), to request the deletion or restriction of your information, or to request your information in a structured, electronic format. Below, we describe the tools and processes for making these requests. You can exercise some of the choices by logging into the Services and using settings available within the Services or your account. Where the Services are administered for you by an administrator (see "Notice to End Users" below), you may need to contact your administrator to assist with your requests first. For all other requests, you may contact us as provided in the Contact Us section below to request assistance.

Your request and choices may be limited in certain cases: for example, if fulfilling your request would reveal information about another person, or if you ask to delete information which we or your administrator are permitted by law or have compelling legitimate interests to keep. Where you have asked us to share data with third parties, for example, by installing third-party apps, you will need to contact those third-party service providers directly to have your information deleted or otherwise restricted. If you have unresolved concerns, you may have the right to complain to a data protection authority in the country where you live, where you work or where you feel your rights were infringed.

**Access and update your information:** Our Services and related documentation give you the ability to access and update certain information about you from within the Service. For example, you can access and delete polling data directly from your account.

**Deactivate your account:** If you no longer wish to use our Services, you or your administrator may be able to deactivate your Services account. If you can deactivate your own account, that setting is available to you in your account settings. Otherwise, please contact your administrator. If you are an administrator and are unable to deactivate an account through your administrator settings, please contact Polly support. Please be aware that deactivating your account does not delete your information; your information remains visible to other Service users based on your past participation within the Services. For more information on how to delete your information, see below.

**Delete your information:** Our Services and related documentation give you the ability to delete certain information about you from within the Service. For example, you can remove content that contains information about you using the delete functionality, or unvote on polls. Please note, however, that we may need to retain certain information for record keeping purposes, to complete transactions or to comply with our legal obligations.

**Request that we stop using your information:** In some cases, you may ask us to stop accessing, storing, using and otherwise processing your information where you believe we don't have the appropriate rights to do so. For example, if you believe a Services account was created for you without your permission or you are no longer an active user, you can request that we delete your account as provided in this policy. Where you gave us consent to use your information for a limited purpose, you can contact us to withdraw that consent, but this will not affect any processing that has already taken place at the time. You can also opt-out of our use of your information for marketing purposes by contacting us, as provided below. When you make such requests, we may need time to investigate and facilitate your request. If there is delay or dispute as to whether we have the right to continue using your information, we will restrict any further use of your information until the request is honored or the dispute is resolved, provided your administrator does not object (where applicable). If you object to information about you being shared with a third-party app, please disable the app or contact your administrator to do so.

**Opt out of communications:** You may opt out of receiving promotional communications from us by using the unsubscribe link within each email, updating your email preferences within your Service account settings menu, or by contacting us as provided below to have your contact information removed from our promotional email list or registration database. Even after you opt out from receiving promotional messages from us, you will continue to receive transactional messages from us regarding our Services. You can opt out of some notification messages in your account settings.

You may be able to opt out of receiving personalized advertisements from other companies who are members of the Network Advertising Initiative or who subscribe to the Digital Advertising Alliance's Self-Regulatory Principles for Online Behavioral Advertising. For more information about this practice and to understand your options, please visit: [aboutads.info](http://aboutads.info), [optout.networkadvertising.org](http://optout.networkadvertising.org) and [youronlinechoices.eu](http://youronlinechoices.eu).

**Turn off Cookie Controls:** Relevant browser-based cookie controls are described in our Cookie Policy.

**Send "Do Not Track" Signals:** Some browsers have incorporated "Do Not Track" (DNT) features that can send a signal to the websites you visit indicating you do not wish to be tracked. Because there is not yet a common understanding of how to interpret the DNT signal, our Services do not currently respond to browser DNT signals. You can use the range of other tools we provide to control data collection and use, including the ability to opt out of receiving marketing from us as described above.

**Data portability:** Data portability is the ability to obtain some of your information in a format you can move from one service provider to another (for instance, when you transfer your mobile phone number to another carrier). Depending on the context, this applies to some of your information, but not to all of your information. Should you request it, we will provide you with an electronic file of your basic account information and the information you create on the spaces you under your sole control i.e. a workspace where you are the sole administrator.

**Automated Decision-Making and Profiling:** Polly does not currently engage in any automated decision-making, including profiling, that produces legal effects or significantly affects individuals. Where you connect an AI assistant to Polly, that assistant may summarize or generate content from your Polly data at your direction; this is assistive and does not constitute automated decision-making producing legal or similarly significant effects. In the event that Polly implements automated decision-making or profiling

processes in the future, we will explicitly inform you of such activities, explain their purpose, and clearly outline your rights, including your right not to be subject to decisions based solely on automated processing under Article 22 of GDPR.

## Other important privacy information

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### Notice to End Users

Many of our products are intended for use by organizations. Where the Services are made available to you through an organization (e.g. your employer), that organization is the administrator of the Services and is responsible for the accounts and/or Service sites over which it has control. If this is the case, please direct your data privacy questions to your administrator, as your use of the Services is subject to that organization's policies. We are not responsible for the privacy or security practices of an administrator's organization, which may be different than this policy.

Administrators may be able to:

- require you to reset your account password;
- restrict, suspend or terminate your access to the Services;
- access information in and about your account;
- access or retain information stored as part of your account;
- install, configure, disable, or remove third-party applications and integrations, including AI assistant connections; approve or revoke permissions requested by Polly through connected Platforms; and
- enable or disable optional features that affect how organization data is processed.

In some cases, administrators can also:

- restrict, suspend or terminate your account access;
- change the email address associated with your account;
- change your information, including profile information;
- restrict your ability to edit, restrict, modify or delete information.

Even if the Services are not currently administered to you by an organization, if you use an email address provided by an organization (such as your work email address) to access the Services, then the owner of the domain associated with your email address (e.g. your employer) may assert administrative control over your account and use of the Services at a later date. You will be notified if this happens.

If you do not want an administrator to be able to assert control over your account or use of the Services, use your personal email address to register for or access the Services. If an administrator has not already asserted control over your account or access to the Services, you can update the email address associated with your account through your account settings in your profile. Once an administrator asserts control over your account or use of the Services, you will no longer be able to change the email address associated with your account without administrator approval.

Please contact your organization or refer to your administrator's organizational policies for more information.

## California Requirements

**Exercising your rights:** If you are a California resident, there are some additional rights that may be available to you under the California Consumer Protection Act ("CCPA"). This policy explains the tools that we have made available to you to exercise your data rights under the CCPA, such as the right to deletion and the right to request access to the categories of information we have collected about you. For more information on how to exercise your rights please visit the "How to access and control your information" section of this policy. We encourage you to manage your information, and to make use of the privacy controls we have included in our Services. You will not be discriminated against for exercising any of your privacy rights under the CCPA. In order to protect your information from unauthorized access or deletion, we may require you to provide additional information for verification. If we cannot verify your identity, we will not provide or delete your information.

**Sharing your personal information:** We don't sell your personal information. We do share your information with others as described in the "How we share information we collect" section of this policy.

**Processing your information:** This policy describes the categories of personal information we may collect, the sources of that information, and our deletion and retention policies. We've also included information about how we may process your information, which includes for "business purposes" under the CCPA — such as to protect against illegal activities, and for the development of new products, features, and technologies. If you have questions about the categories of information we may collect about you, please be sure to visit the section of this policy called, "What information we collect about you." For more details about our processing activities, please be sure to visit the section called, "How we use information we collect."

If you have any questions or would like to exercise your rights under the CCPA, you can reach out to us at [privacy@polly.ai](mailto:privacy@polly.ai).

## Our policy towards children

The Services are not directed to individuals under 16. We do not knowingly collect personal information from children under 16. If we become aware that a child under 16 has provided us with personal information, we will take steps to delete such information. If you become aware that a child has provided us with personal information, please contact our support services.

## Changes to our Privacy Policy

We may update this Privacy Policy from time to time. We will post the revised Policy on this page and update the "Last Updated" date. If we make a material change to how we collect, use, or disclose personal information, we will provide additional notice through a method we regularly use to communicate with users or administrators, such as an in-product notice, account message, login notice, or email, as

appropriate and as required by applicable law. Where applicable law requires consent before a materially different use of previously collected information, we will obtain that consent before beginning the new use. We will keep prior versions of this Privacy Policy in an archive for review.

If you disagree with any changes to this privacy policy, you will need to stop using the Services and deactivate your account(s), as outlined above.

## Contact Us

Your information is controlled by Subcurrent, Inc. (referred to as "Polly"). If you have questions or concerns about how your information is handled, please direct your inquiry to [privacy@polly.ai](mailto:privacy@polly.ai).

## International Data Transfers and Data Processing Addendum

When transferring data from the European Union, the European Economic Area, the UK, and Switzerland, Polly employs safeguards for cross border transfer of personal data as required by applicable law. Polly relies upon the Standard Contractual Clauses as included in our Data Processing Addendum. Polly also complies with the EU-U.S. Data Privacy Framework (the "EU-U.S. DPF"), the UK Extension to the EU-U.S. DPF (the "UK Extension"), and the Swiss-U.S. Data Privacy Framework (the "Swiss-U.S. DPF"), as set forth by the U.S. Department of Commerce.

Polly complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. Polly has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union and the United Kingdom in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF. Polly has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) Program, and to view our certification, please visit [dataprivacyframework.gov](https://dataprivacyframework.gov).

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Polly commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs) and the UK Information Commissioner's Office (ICO) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved complaints concerning our handling of human resources data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF in the context of the employment relationship.

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Polly commits to refer unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF to the International Centre for Dispute Resolution, the international division of the American Arbitration Association (ICDR-AAA), an alternative dispute resolution provider based in the United States. If you do not receive timely acknowledgment of your DPF Principles-related complaint from us, or if we have not

addressed your DPF Principles-related complaint to your satisfaction, please visit [go.adr.org/dpf\\_irm.html](https://go.adr.org/dpf_irm.html) for more information or to file a complaint. The services of the International Centre for Dispute Resolution are provided at no cost to you.

Polly complies with the DPF Principles for all onward transfers of personal data we receive from the European Union, the UK and Switzerland in reliance on the EU-U.S. DPF Principles, the UK Extension and/or the Swiss-U.S. DPF Principles, including the onward transfer liability provisions. In particular, where we have received your personal information in the United States in reliance upon the EU-U.S. DPF Principles, the UK Extension and/or the Swiss-U.S. DPF Principles and we subsequently transfer that information to a third party acting as an agent, and such third party agent processes your personal information in a manner inconsistent with those Principles, we will remain responsible unless we can prove we are not responsible for the event giving rise to the damage.

With respect to personal data processed pursuant to the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF), Polly is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, Polly may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. Under certain conditions that are fully described on the Data Privacy Framework website, you may invoke binding arbitration when other dispute resolution procedures have been exhausted.

Customers requiring a copy of our Data Processing Addendum can request one by contacting us at [privacy@polly.ai](mailto:privacy@polly.ai).

# Cookie Policy

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## What is a cookie?

Cookies are small data files that are placed on your computer or mobile device when you visit a website, mobile app or use an online platform. Cookies are widely used by online service providers to facilitate and help to make the interaction between users and websites, mobile apps and online platforms faster and easier, as well as to provide reporting information.

Cookies set by the website and/or mobile app and/or platform owner (in this case, Polly) are called "first party cookies". Cookies set by parties other than the website and/or mobile app and/or platform owner are called "third party cookies". Third party cookies enable third party features or functionality to be provided on or through the website and/or mobile app and/or platform (e.g. like advertising, interactive content and analytics). The parties that set these third party cookies can recognize your computer or device both when it visits the website and/or mobile app and/or platform in question and also when it visits certain other websites and/or mobile apps and/or platforms.

## Does Polly use cookies?

Yes. Polly uses cookies and similar technologies like single-pixel gifs and web beacons. We use both session-based and persistent cookies. Polly sets and accesses our own cookies on the domains operated by Polly and its corporate affiliates (collectively, the "Sites"). In addition, we use third party cookies, like Google Analytics.

## How is Polly using cookies?

Some cookies are associated with your account and personal information in order to remember that you are logged in and which workspaces you are logged into. Other cookies are not tied to your account but are unique and allow us to carry out analytics and customization, among other similar things.

Cookies can be used to recognize you when you visit a Site or use our Services, remember your preferences, and give you a personalized experience that's consistent with your settings. Cookies also make your interactions faster and more secure.

| CATEGORY OF USE                            | DESCRIPTION                                                                                                                                                                                                                                                                                                                                                          |
|--------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Authentication</b>                      | If you're signed in to our Services, cookies help us show you the right information and personalize your experience.                                                                                                                                                                                                                                                 |
| <b>Security</b>                            | We use cookies to enable and support our security features, and to help us detect malicious activity.                                                                                                                                                                                                                                                                |
| <b>Preferences, features and services</b>  | Cookies can tell us which language you prefer and what your communications preferences are. They can help you fill out forms on our Sites more easily. They also provide you with features, insights, and customized content.                                                                                                                                        |
| <b>Marketing</b>                           | We may use cookies to help us deliver marketing campaigns and track their performance (e.g., a user visited our Help Center and then made a purchase). Similarly, our partners may use cookies to provide us with information about your interactions with their services, but use of those third-party cookies would be subject to the service provider's policies. |
| <b>Performance, Analytics and Research</b> | Cookies help us learn how well our Sites and Services perform. We also use cookies to understand, improve, and research products, features, and services, including to create logs and record when you access our Sites and Services from different devices, such as your work computer or your mobile device.                                                       |

## How are cookies used for advertising purposes?

Cookies and other ad technology such as beacons, pixels, and tags help us market more effectively to users that we and our partners believe may be interested in Polly. They also help provide us with aggregated auditing, research, and reporting, and know when content has been shown to you.

## What can you do if you don't want cookies to be set or want them to be removed, or if you want to opt out of interest-based targeting?

Some people prefer not to allow cookies, which is why most browsers give you the ability to manage cookies to suit you. In some browsers you can set up rules to manage cookies on a site-by-site basis, giving you more fine-grained control over your privacy. What this means is that you can disallow cookies from all sites except those that you trust. Browser manufacturers provide help pages relating to cookie management in their products, including Google Chrome, Internet Explorer, Mozilla Firefox, Safari (Desktop and Mobile), Android Browser, and Opera (Desktop and Mobile). For other browsers, please consult the documentation that your browser manufacturer provides.

You can opt out of interest-based targeting provided by participating ad servers through the Digital Advertising Alliance ([youradchoices.com](https://youradchoices.com)). In addition, on your iPhone, iPad or Android, you can change your device settings to control whether you see online interest-based ads.

If you limit the ability of websites and applications to set cookies, you may worsen your overall user experience and/or lose the ability to access the services, since it will no longer be personalized to you. It may also stop you from saving customized settings, like login information.

### **Does Polly respond to Do Not Track Signals?**

Some browsers offer "Do Not Track" signals. Because there is not a uniform industry standard for interpreting DNT signals, Polly does not currently respond to DNT signals as a standalone control. Where applicable law requires us to recognize an opt-out preference signal, such as a qualifying universal opt-out mechanism, we will process that signal as required by law.

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