

Last revised: September 8, 2022

Sextant AI PRIVACY STATEMENT

The purpose of this Privacy Statement is to inform you about the types of Personal Information (as defined below) Sextant AI Inc. and Sextant AI Canada, Inc. (collectively, “**Sextant AI**,” “**we**,” or “**us**”) collects, uses and discloses, including in connection with our website (the “**Site**”) and the related content, platform, services, and other functionality offered on or through the online services (collectively, the “**Services**”). It explains how we use and disclose that information, the choices you have regarding such use and disclosure, and how you may correct that information. This Privacy Statement applies to any information we collect or receive about you, from any source.

From time to time, we may make changes to this Privacy Statement. The Privacy Statement is current as of the “last revised” date which appears at the top of this page. If we make material changes to this Privacy Statement, we may notify individuals by email to their registered email address, by prominent posting on this Site or our Services, or through other appropriate communication channels. All changes shall be effective from the date of publication unless otherwise provided. We will treat Personal Information in a manner consistent with the Privacy Statement under which it was collected, unless we have your consent to treat it differently, in which case we may provide you with additional or alternative privacy disclosures.

The following topics are covered in this Privacy Statement:

1. To which companies does this Privacy Statement apply?
2. What is Personal Information?
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5. How do we use your Personal Information?
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13. How fast will we respond to your written requests?
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17. How do you contact us regarding access to your Personal Information or our privacy practices?

1. To which companies does this Privacy Statement apply?

This Privacy Statement applies to the collection, use and disclosure of Personal Information by Sextant AI.

2. What is Personal Information?

“**Personal Information**” is any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly to an individual. Personal Information, however, does not include aggregated or deidentified information that is maintained in a form that is not reasonably capable of being associated with or linked to an individual.

3. How do we collect your Personal Information?

We may collect Personal Information from you directly (for example, when you register with us) and/or from third parties, where we have obtained your consent to do so, at your direction, or as otherwise required or permitted by law.

Personal Information Collected from Site Visitors and Account Holders

When you use the Services, you may register for a membership, request our eBook or Demo video, set up a user profile, form relationships, send messages, post comments on our blog, submit an inquiry, and share information.

We collect the following Personal Information submitted to us by visitors to our Site and account holders:

- **Contact Information**, including first and last name, email address, phone number and communication preferences.
- **Inquiry Information**, including information submitted when requesting our eBook or Demo video, information provided in our chat feature, and any other information provided in custom messages sent through the forms or contact information provided on our Site.
- **Blog-Related Information**, including information submitted through a comment on our blog, such as first and last name, email address, and the content of the comment(s).
- **Account Information**, including name, industry, organization, organization representative contact information, job title, phone number, email address, username and password, profile information, payment and purchase history information, information provided in custom messages, and any other information you provide to us. Please note we utilize a third-party provider to process payments on our behalf and do not accept payment directly through our Services.

We collect such information so that we can provide our Services and offer improved or personalized features. In most cases, we retain it so that, for instance, you can return to view prior messages you have sent or easily see parties you have engaged with.

Personal Information Automatically Collected

We or our third-party providers on our behalf may collect Personal Information from your device, browsing actions and website usage patterns automatically when visiting or interacting with our Services, which may include your IP address, operating system, the type of your device, location data, weblogs, time/date of visit, browser used, browser id, the URL entered and the referring web addresses, the time spent on our Site or our other Services and any errors that may occur during the visit to our Site or the

use of our other Services, electronic path taken to our Site, through our Site and when exiting our Site, as well as other analytics data, other communication data, searches conducted, and pages visited.

In addition, to ensure that our Site is optimized for ease of use, we or our third-party service providers may use (i) cookies or small data files stored on an individual's computer that may contain certain information and (ii) other, related technologies, such as web beacons, pixels, embedded scripts, location-identifying technologies and logging technologies (collectively, "**cookies**") to automatically collect this Personal Information. These cookies are intended to optimize your experience of our Site. For example, our Site uses Google Analytics, a web analytics service provided by Google, Inc. ("**Google**"), to collect and view reports about the traffic on our Site. More information about the use of Google Analytics for these analytical and non-advertising purposes can be obtained by visiting Google's privacy policy [here](#) and Google's currently available opt-out options are available [here](#). We may also use cookies in HTML-based emails sent to our users to track which emails are opened by recipients. The information is used to enable more accurate reporting and improve the Services.

To manage cookies, an individual may change their browser settings to: (i) notify them when they receive a cookie, so the individual can choose whether or not to accept it; (ii) disable existing cookies; or (iii) automatically block all or certain cookies. Please note that doing so may negatively impact an individual's experience using our Site, as some features and offerings may not work properly or at all. Depending on an individual's device and operating system, the individual may not be able to delete or block all cookies. In addition, if an individual wants to reject cookies across all browsers and devices, the individual will need to do so on each browser on each device they actively use. An individual may also set their email options to prevent the automatic downloading of images that may contain technologies that would allow us to know whether they have accessed our email and performed certain functions with it.

Personal Information from Third Parties

We also obtain Personal Information from third parties; which we often combine with Personal Information we collect either automatically or directly from an individual. We may receive Personal Information about you from our business partners and service providers and combine this information with other information we collect from or about you. The third parties may include our hospitality industry partners, technology providers, social networks, website operators, payment processors, marketing partners, shipping providers, data providers, job application platforms, references, background check providers and recruiters. The information may include contact information, demographic information, interests, information about your orders, educational and professional history, background checks and performance reviews. We use this information to administer and facilitate our Services, process your orders, conduct marketing activities, and discover and evaluation job candidates. You may opt-out of our collection of your personal information from third parties to conduct marketing activities by contacting us as set out in Section 19 of this Privacy Statement.

4. Where do we store your Personal Information?

For users of <https://www.getsextant.ai>, we store data on servers in the United States.

For users of <https://www.getsextant.ai>, we store data on servers in Canada.

No data from <https://www.getsextant.ai> is stored with data from <https://www.getsextant.ai>, in Canada.

We may commence operations in countries other than Canada or the US, in which case we may elect to set up specifically dedicated instances of Sextant AI locally, accessed via a separate domain name. These operations will be distinct from getsextant.ai and from getsextant.ai. No data from getsextant.ai or getsextant.ai will reside on servers affiliated with these international instances.

5. How do we use your Personal Information?

In addition to the uses described above, we may generally use your Personal Information for the following purposes (the “**Purposes**”):

- to develop, operate, maintain, and provide to you the requested Services, and to register your membership with our Services;
- to develop and maintain strong business relationships with customers, advertisers and potential customers and partners;
- to manage your account with Sextant AI;
- to respond to questions, comments or concerns regarding Sextant AI;
- to advise you about new Sextant AI programs and services that may be of interest to you;
- to provide you with information about your engagement with other users;
- to diagnose service or technical problems
- to allow for more meaningful and useful sales and marketing initiatives;
- to better understand our web traffic and marketing effectiveness through the use of third-party analytics providers, such as Google Analytics;
- to personalize content and to store and remember information to help you more efficiently access your account, and to personalize your user experience;
- to collect opinions and comments in regard to Sextant AI operations;
- to perform demographic analysis for planning purposes (but only on an aggregate and anonymous basis);
- to recruit for positions at Sextant AI and for other employment or marketing -related tasks;
- to enable us to conduct surveys;
- to conduct, manage and grow our organization;
- to prevent, investigate and provide notice of fraud, unlawful or criminal activity, unauthorized access to or use of Personal Information, the Services or our data systems, and to meet legal, regulatory, judicial and contractual obligations;
- to investigate and resolve disputes and security issues and to enforce our Terms of Service;
- such purposes for which Sextant AI may obtain consent from time to time; and
- such other uses as may be permitted or required by applicable law.

Where an individual chooses to contact us, we may need additional information to fulfill the request or respond to inquiries. We may provide additional privacy disclosures where the scope of the inquiry/request and/or Personal Information we require fall outside the scope of this Privacy Statement. In that case, the additional privacy disclosures will govern how we may process the information provided at that time.

6. To whom do we provide your Personal Information?

We may share your Personal Information in the following ways:

- **Service Providers.** We may share your Personal Information with third party service providers who perform services on our behalf, such as technology providers (including technology support providers, email communications providers, analytics providers, data storage providers, and web and video hosting providers and developers), and service providers that provide telephone support, data storage or processing, or hosting. **To Other Users of the Services.** When you use the Services, we will share with other users of the Services the personal information that you choose to disclose and make available to others. We will share your personal information with organizations and individuals who issue Requests for Proposals (RFP) or Requests for Quotes (RFQ) when you respond to an RFP or RFQ. The collection, use, and disclosure of personal information by other users, including RFP and RFQ issuers, is subject to the privacy policies and practices of such issuers.
- **Business Partners.** We may disclose personal information to our third-party business partners with whom we partner for the purpose of providing additional value-added services.
- **Regulatory or Legal Requirements, Safety and Terms Enforcement.** We may disclose personal information to governmental regulatory authorities as required by law, including for tax or accounting purposes, in response to their requests for such information or to assist in investigations. We may also disclose personal information to third parties in connection with claims, disputes or litigation, when otherwise required by law, or if we determine its disclosure is necessary to protect the health and safety of you or any other person, to protect against fraud or credit risk, or to enforce our legal rights or contractual commitments that you have made.
- **Business Transaction or Reorganization:** We may take part in or be involved with a corporate business transaction, such as a merger, acquisition, joint venture, or financing or sale of company assets. We may disclose Personal Information to a third party during negotiation of, in connection with or as an asset in such a corporate business transaction. Personal Information may also be disclosed in the event of insolvency, bankruptcy or receivership.
- **Otherwise With Consent or at Your Direction:** We may disclose Personal Information about you to certain other third parties or publicly with your consent or at your direction. For example, with your consent or at your direction we may post a testimonial on our Site or service-related publications.

If you are a resident of the State of Nevada in the United States, Chapter 603A of the Nevada Revised Statutes permits a Nevada resident to opt out of future sales of certain covered information that a website

operator has collected or will collect about the resident. Although we do not sell covered information, please contact us at support@getsextant.ai to submit such a request.

For written information about our policies and practices regarding service providers outside of Canada and the United States, contact our Privacy Information Officer in accordance with the “**How do you contact us regarding access to your Personal Information or our privacy practices?**” section below.

7. When and how do we obtain your consent?

Where required by applicable law, we generally obtain your consent prior to collecting, and in any case, prior to using or disclosing your Personal Information. You may provide your consent to us either orally, electronically or in writing. The form of consent that we seek, including whether it is express or implied, will largely depend on the sensitivity of the Personal Information and the reasonable expectations you might have in the circumstances.

8. How do we ensure the privacy of your Personal Information when dealing with our affiliates and other third parties?

We ensure that all affiliates and other third parties that are engaged to perform services on our behalf and are provided with Personal Information are contractually required to observe the intent of this Privacy Statement and our privacy practices.

9. How long will we utilize, disclose or retain your Personal Information?

We may keep a record of your Personal Information (including correspondence and comments) in a file specific to you. We will utilize, disclose or retain your Personal Information for as long as necessary to fulfill the purposes for which that Personal Information was collected and as permitted or required by law.

10. How can you review your Personal Information that we have collected, utilized or disclosed?

If you make a written request to review any Personal Information about you that we have collected, utilized or disclosed, we will provide you with any such Personal Information to the extent required by law. If we are required by law to fulfill your request, we will make such Personal Information available to you in a form that is generally understandable and will explain any abbreviations or codes.

11. How do you know that the Personal Information we have on you is accurate?

We will not routinely update your Personal Information, unless such a process is required by law. We expect you, from time to time, to supply us with written updates to your Personal Information, when required.

12. What if the Personal Information we have on you is inaccurate?

At any time, you can challenge the accuracy or completeness of your Personal Information in our records. If you successfully demonstrate that your Personal Information in our records is inaccurate or incomplete, we will amend the Personal Information as required. Where appropriate, we will transmit the amended information to third parties having access to your Personal Information.

13. How fast will we respond to your written requests?

We will attempt to respond to each of your written requests not later than thirty (30) days after receipt of such requests. We will advise you in writing if we cannot meet your requests within this time limit. You have the right to make a complaint to the Privacy Commissioner of Canada or applicable provincial privacy commissioner in respect of this time limit.

14. Are there any costs to you for requesting information about your Personal Information or our privacy practices?

We will not charge any costs for you to access your Personal Information in our records without first providing you with an estimate of the approximate costs, if any.

15. How do we know that it is really you requesting your Personal Information?

We may request that you provide sufficient identification to permit access to the existence, use or disclosure of your Personal Information. Any such identifying information shall be used only for this purpose.

16. What safeguards have we implemented to protect your Personal Information?

We have implemented commercially reasonable physical, organizational, contractual and technological security measures to protect your Personal Information from loss or theft, unauthorized access, disclosure, copying, use or modification. No method of information transmission or information storage is 100% secure or error-free, so we unfortunately cannot guarantee absolute security.

17. Children's Personal Information

Our Services are not directed to, and we do not intend to, or knowingly, collect or solicit Personal Information from children under the age of 13. If an individual is under the age of 13, they should not use our Services or otherwise provide us with any Personal Information either directly or by other means. If a child under the age of 13 has provided Personal Information to us, we encourage the child's parent or guardian to contact us to request that we remove the Personal Information from our systems. If we learn that any Personal Information we collect has been provided by a child under the age of 13, we will promptly delete that Personal Information.

18. Third-Party Websites or Services

Our Services may include links to or integration with third-party websites, plug-ins and applications, or may allow you to purchase, subscribe to, or use other products and services from third parties. Except where we post, link to or expressly adopt or refer to this Privacy Statement, this Privacy Statement does not apply to, and we are not responsible for, any Personal Information practices of third-party websites and online services or the practices of other third parties. To learn about the Personal Information practices of third parties, please refer to their respective privacy notices.

19. How do you contact us regarding access to your Personal Information or our privacy practices?

All comments, questions, concerns or complaints regarding your Personal Information or our privacy practices should be forwarded to our Privacy Information Officer as follows:

In writing: Attn: Privacy Information Officer

Address: Sextant AI, Inc.
87 35th Street, 2nd Floor
NYU Tandon Veterans Future Lab
Brooklyn, NY 11232
United States of America
917-414-2921

By e-mail: support@getsextant.ai