CAFEX COMMUNICATIONS PRIVACY POLICY

Last updated November 06, 2026

This Privacy Notice for CafeX Communications Inc. ("**we**," "**us**," or "**our**"), describes how and why we might access, collect, store, use, and/or share ("**process**") your personal information when you use our services ("**Services**"), including when you:

- Visit our website at https://cafex.ai or any website of ours that links to this Privacy Notice
- Download and use our mobile application (CafeX), or any other application of ours that links to this Privacy Notice
- Use CafeX. CafeX Platform enables organizations in regulated industries — healthcare, banking, insurance, and government — to re-imagine and optimize how they digitally engage with employees, customers and partners. It builds on existing investments in operational systems, bringing fragmented, often custom and siloed data and applications together in a single, clean user interface. Using that data and established working practices, CafeX automates routine steps and supports agents in making consistent decisions, improving internal efficiency and the experience of customers and partners.
- Engage with us in other related ways, including any marketing or events

Questions or concerns? Reading this Privacy Notice will help you understand your privacy rights and choices. We are responsible for making decisions about how your personal information is processed. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at compliance@cafex.com.

SUMMARY OF KEY POINTS

This summary provides key points from our Privacy Notice, but you can find out more details about any of these topics by clicking the link following each key point or by using our table of contents below to find the section you are looking for.

What personal information do we process? When you visit, use, or navigate our Services, we may process personal information depending on how you interact with us and the Services, the choices you make, and the products and features you use. Learn more about personal information you disclose to us.

Do we process any sensitive personal information? Some of the information may be considered "special" or "sensitive" in certain jurisdictions, for example your racial or ethnic origins, sexual orientation, and religious beliefs. We do not process sensitive personal information.

Do we collect any information from third parties? We do not collect any information from third parties.

How do we process your information? We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so. Learn more about how we process your information.

In what situations and with which types of parties do we share personal information? We may share information in specific situations and with specific categories of third parties. Learn more about when and with whom we share your personal information.

How do we keep your information safe? We have adequate organizational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Learn more about how we keep your information safe.

What are your rights? Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information. Learn more about your privacy rights.

How do you exercise your rights? The easiest way to exercise your rights is by emailing us at compliance@cafex.com. We will consider and act upon any request in accordance with applicable data protection laws.

Want to learn more about what we do with any information we collect? Review the Privacy Notice in full.

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1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

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

We collect personal information that you voluntarily provide to us when you register on the Services, express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.

Personal Information Provided by You. The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

- names
- email addresses
- contact or authentication data

Sensitive Information. We do not process sensitive information.

Google and Microsoft Sign-In Data. We may provide you with the option to register with us or sign in using your existing Google or Microsoft account. If you choose to do this, we will collect certain profile information about you from that provider, as described in the section called "HOW DO WE HANDLE GOOGLE AND MICROSOFT SIGN-IN?" below.

Application Data. If you use our application(s), we also may collect the following information if you choose to provide us with access or permission:

- *Push Notifications.* We may request to send you push notifications regarding your account or certain features of the application(s). If you wish to opt out from receiving these types of communications, you may turn them off in your device's settings.

This information is primarily needed to maintain the security and operation of our application(s), for troubleshooting, and for our internal analytics and reporting purposes.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

Information automatically collected

In Short:*Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our Services.*
We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies. You can find out more about this in our Cookie Notice: https://privacy.cafex.ai/cookie/.

The information we collect includes:

- *Log and Usage Data.* Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called "crash dumps"), and hardware settings).
- *Device Data.* We collect device data such as information about your computer, phone, tablet, or other device you use to access the Services. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type,

hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.

- *Location Data.* When you visit our website, we may infer your approximate location (such as your country or region) from your IP address. We do not use GPS or collect precise geolocation data.

Google API

Our use of information received from Google APIs will adhere to Google API Services User Data Policy, including the Limited Use requirements.

2. HOW DO WE PROCESS YOUR INFORMATION?

In Short: *We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We process the personal information for the following purposes listed below. We may also process your information for other purposes only with your prior explicit consent.*

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

- **To facilitate account creation and authentication and otherwise manage user accounts.** We may process your information so you can create and log in to your account, as well as keep your account in working order.
- **To deliver and facilitate delivery of services to the user.** We may process your information to provide you with the requested service.
- **To respond to user inquiries/offer support to users.** We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.
- **To send administrative information to you.** We may process your information to send you details about our products and services, changes to our terms and policies, and other similar information.
- **To protect our Services.** We may process your information as part of our efforts to keep our Services safe and secure, including fraud monitoring and prevention.
- **To identify usage trends.** We may process information about how you use our Services to better understand how they are being used so we can improve them.
- **To save or protect an individual's vital interest.** We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.

3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?

In Short: *We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e., legal basis) to do so under applicable law, like with your consent, to comply with laws, to provide you with services to enter into or fulfill our contractual obligations, to protect your rights, or to fulfill our legitimate business interests.*

If you are located in the EU or UK, this section applies to you.

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

- **Consent.** We may process your information if you have given us permission (i.e., consent) to use your personal information for a specific purpose. You can withdraw your consent at any time. Learn more about withdrawing your consent.
- **Performance of a Contract.** We may process your personal information when we believe it is necessary to fulfill our contractual obligations to you, including providing our Services or at your request prior to entering into a contract with you.
- **Legitimate Interests.** We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. For example, we may process your personal information for some of the purposes described in order to:
- Analyze how our Services are used so we can improve them to engage and retain users
- Diagnose problems and/or prevent fraudulent activities
- **Legal Obligations.** We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.
- **Vital Interests.** We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

In legal terms, we are generally the "data controller" under European data protection laws of the personal information described in this Privacy Notice, since we determine the means and/or purposes of the data processing we perform. This Privacy Notice does not apply to the personal information we process as a "data processor" on behalf of our customers. In those situations, the customer that we provide services to and with whom we have entered into a data processing agreement is the "data controller" responsible for your personal information, and we merely process your information on their behalf in accordance with your instructions. If you want to know more about our customers' privacy practices, you should read their privacy policies and direct any questions you have to them.

If you are located in Canada, this section applies to you.

We may process your information if you have given us specific permission (i.e., express consent) to use your personal information for a specific purpose, or in situations where your permission can be inferred (i.e., implied consent). You can withdraw your consent at any time.

In some exceptional cases, we may be legally permitted under applicable law to process your information without your consent, including, for example:

- If collection is clearly in the interests of an individual and consent cannot be obtained in a timely way
- For investigations and fraud detection and prevention
- For business transactions provided certain conditions are met
- If it is contained in a witness statement and the collection is necessary to assess, process, or settle an insurance claim
- For identifying injured, ill, or deceased persons and communicating with next of kin
- If we have reasonable grounds to believe an individual has been, is, or may be victim of financial abuse
- If it is reasonable to expect collection and use with consent would compromise the availability or the accuracy of the information and the collection is reasonable for purposes related to investigating a breach of an agreement or a contravention of the laws of Canada or a province

- If disclosure is required to comply with a subpoena, warrant, court order, or rules of the court relating to the production of records
- If it was produced by an individual in the course of their employment, business, or profession and the collection is consistent with the purposes for which the information was produced
- If the collection is solely for journalistic, artistic, or literary purposes
- If the information is publicly available and is specified by the regulations
- We may disclose de-identified information for approved research or statistics projects, subject to ethics oversight and confidentiality commitments

4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

In Short: *We may share information in specific situations described in this section and/or with the following categories of third parties.*
Vendors, Consultants, and Other Third-Party Service Providers. We may share your data with third-party vendors, service providers, contractors, or agents ("**third parties**") who perform services for us or on our behalf and require access to such information to do that work. We have contracts in place with our third parties, which are designed to help safeguard your personal information. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will also not share your personal information with any organization apart from us. They also commit to protect the data they hold on our behalf and to retain it for the period we instruct. Third parties are required to maintain the same level of protection as mandated by the EU-US Data Privacy Framework and Swiss-US Data Privacy Framework Principles.

The categories of third parties we may share personal information with are as follows:

- Customer Support & Ticketing Services
- Cloud Computing Services
- Communication & Collaboration Tools
- Data Analytics Services
- Data Storage Service Providers
- User Account Registration & Authentication Services
- Website Hosting Service Providers

We also may need to share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honor this Privacy Notice. Affiliates include our parent company and any subsidiaries, joint venture partners, or other companies that we control or that are under common control with us.

5. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

In Short: *We may use cookies and other tracking technologies to collect and store your information.*
We may use cookies and similar tracking technologies (like web beacons and pixels) to gather information when you interact with our Services. Some online tracking technologies help us maintain the security of our Services and your account, prevent crashes, fix bugs, save your preferences, and assist with basic site functions.

We do not use cookies or other tracking technologies for advertising, and we do not permit third parties to use them on our Services to show you targeted advertising.

Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Notice: https://privacy.cafex.ai/cookie/.

Google Analytics

We use Google Analytics on our website to track and analyze how visitors use it. Google Analytics is not used within the CafeX Platform or our applications. To opt out of being tracked by Google Analytics, visit https://tools.google.com/dlpage/gaoptout. For more information on the privacy practices of Google, please visit the Google Privacy & Terms page.

6. HOW DO WE HANDLE GOOGLE AND MICROSOFT SIGN-IN?

In Short: *If you choose to register or sign in to our Services using a Google or Microsoft account, we may have access to certain information about you.*
Our Services offer you the ability to register and sign in using your Google or Microsoft account. Where you choose to do this, we will receive certain profile information about you from that provider, typically your name, email address, and profile picture.

We will use the information we receive only for the purposes that are described in this Privacy Notice or that are otherwise made clear to you on the relevant Services. Please note that we do not control, and are not responsible for, other uses of your personal information by Google or Microsoft. We recommend that you review their privacy notice to understand how they collect, use, and share your personal information, and how you can set your privacy preferences on their sites and apps.

7. IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?

In Short: *We may transfer, store, and process your information in countries other than your own.*
Our servers are located in the United States. Regardless of your location, please be aware that your information may be transferred to, stored by, and processed by us in our facilities and in the facilities of the third parties with whom we may share your personal information (see "WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?" above), including facilities in the United States, and other countries.

If you are a resident in the European Economic Area (EEA), United Kingdom (UK), or Switzerland, then these countries may not necessarily have data protection laws or other similar laws as comprehensive as those in your country. However, we will take all necessary measures to protect your personal information in accordance with this Privacy Notice and applicable law.

European Commission's Standard Contractual Clauses:

We have implemented measures to protect your personal information, including by using the European Commission's Standard Contractual Clauses for transfers of personal information between our group companies and between us and our third-party providers. These clauses require all recipients to protect all personal information that they process originating from the EEA or UK in accordance with European data protection laws and regulations. Our Standard Contractual Clauses can be provided upon request. We have implemented similar appropriate safeguards with our third-party service providers and partners and further details can be provided upon request.

EU-US, UK Extension to the EU-US, and Swiss-US Data Privacy Framework:

We and the following entities and subsidiaries: CafeX Communications Inc comply with the EU-US Data Privacy Framework, the UK Extension to the EU-US Data Privacy Framework, and the Swiss-US Data Privacy Framework as set forth by the US Department of Commerce with regard to the processing of personal data received from the EU, the UK (and Gibraltar), and Switzerland. We have certified to the US Department of Commerce that we adhere to the EU-US Data Privacy Framework Principles and the Swiss-US Data Privacy Framework Principles. If there is any conflict between the terms in this Privacy Notice and the Data Privacy Framework Principles, the Principles shall govern. Learn more about the Data Privacy Framework program. To view our certification, please visit https://dataprivacyframework.gov/participant/5840.

Pursuant to the Data Privacy Framework, EU, UK, and Swiss individuals have the right to obtain our confirmation of whether we maintain personal information relating to you in the United States. Upon request, we will provide you with access to the personal information that we hold about you. You may also correct, amend, or delete the personal information we hold about you. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data transferred to the United States under the Data Privacy Framework, should direct their query to compliance@cafex.com. If requested to remove data, we will respond within a reasonable timeframe.

If we have received your personal information in the United States and subsequently transfer that information to a third party acting as our agent, and such third party agent processes your personal information in a manner inconsistent with the Data Privacy Framework Principles, we will remain liable unless we can prove we are not responsible for the event giving rise to the damage.

We will provide an individual opt-out choice, or opt-in for sensitive data, before we share your data with third parties other than our agents, or before we use it for a purpose other than which it was originally collected or subsequently authorized. To request to limit the use and disclosure of your personal information, please submit a written request to compliance@cafex.com.

In compliance with the Data Privacy Framework Principles, we commit to resolve complaints about your privacy and our collection or use of your personal information transferred to the United States pursuant to the Data Privacy Framework. EU, UK, and Swiss individuals with Data Privacy Framework inquiries or complaints should first contact us by email at compliance@cafex.com. If you do not receive a timely acknowledgement of your complaint or if your complaint is not satisfactorily addressed, you may contact our independent dispute resolution provider based in the United States, JAMS. Please visit https://www.jamsadr.com/dpf-dispute-resolution for more information or to file a complaint. These services are provided to you free of charge.

If your Data Privacy Framework complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms.

We are subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC). In certain situations, we may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Please be sure to review the following sections of this Privacy Notice for additional details relevant to our participation in the Data Privacy Framework program:

- WHAT INFORMATION DO WE COLLECT? *To learn more about the types of personal data we collect.*
- HOW DO WE PROCESS YOUR INFORMATION? *To learn more about the purposes for which we collect and use personal information about you.*
- WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION? *To learn more about the type or identity of third parties to which we disclose personal information, and the purposes for which we do so.*

- WHAT ARE YOUR PRIVACY RIGHTS? *To learn more about the right of individuals to access their personal data.*

CafeX's independent recourse mechanism is JAMS, a U.S.-based alternative dispute resolution provider. If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact JAMS at https://www.jamsadr.com/dpf-dispute-resolution; its services are provided at no cost to you. Under certain conditions, you may also invoke binding arbitration as described in Annex I of the DPF Principles. CafeX remains responsible under the DPF Principles for personal information we transfer to third parties acting as our agents, unless we prove we are not responsible for the event giving rise to the damage. We may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. Our full DPF Program Notice is available at https://privacy.cafex.ai/dpf/.

8. HOW LONG DO WE KEEP YOUR INFORMATION?

In Short: *We keep your information for as long as necessary to fulfill the purposes outlined in this Privacy Notice unless otherwise required by law.*
We will only keep your personal information for as long as it is necessary for the purposes set out in this Privacy Notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). In most cases, we keep your personal information for as long as you have an account with us, and for longer only where needed for security, audit, legal or support records.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

9. HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short: *We aim to protect your personal information through a system of organizational and technical security measures.*
We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

10. DO WE COLLECT INFORMATION FROM MINORS?

In Short: *We do not knowingly collect data from or market to children under 18 years of age or the equivalent age as specified by law in your jurisdiction.*
We do not knowingly collect, solicit data from, or market to children under 18 years of age or the equivalent age as specified by law in your jurisdiction, nor do we knowingly sell such personal information. By using the Services, you represent that you are at least 18 or the equivalent age as specified by law in your jurisdiction or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age or the equivalent age as specified by law in your jurisdiction has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18 or the equivalent age as specified by law in your jurisdiction, please contact us at compliance@cafex.com.

11. WHAT ARE YOUR PRIVACY RIGHTS?

In Short: *Depending on your state of residence in the US or in some regions, such as the European Economic Area (EEA), United Kingdom (UK), Switzerland, and Canada, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time, depending on your country, province, or state of residence.*

In some regions (like the EEA, UK, Switzerland, and Canada), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; (iv) if applicable, to data portability; and (v) not to be subject to automated decision-making. If a decision that produces legal or similarly significant effects is made solely by automated means, we will inform you, explain the main factors, and offer a simple way to request human review. In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us by using the contact details provided in the section "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?" below.

We will consider and act upon any request in accordance with applicable data protection laws.

If you are located in the UK and are unhappy with how we have handled your personal information, you can make a complaint directly to us. This is in addition to the rights you have under the UK General Data Protection Regulation and the Data Protection Act 2018.

How to contact us:

- **Email:** compliance@cafex.com
- **Post:** See "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?"

What happens after you complain

- We will acknowledge your complaint within 30 days of receiving it.
- We will investigate without unjustifiable or excessive delay.
- We will keep you informed of progress and explain the outcome.

If you are not happy with our final response, you can refer your complaint to the Information Commissioner's Office, the UK supervisory authority.

- **Website:** ico.org.uk/make-a-complaint
- **Helpline:** 0303 123 1113
- **Post:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

If you are located in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your Member State data protection authority or UK data protection authority.

If you are located in Switzerland, you may contact the Federal Data Protection and Information Commissioner.

Withdrawing your consent: If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?" below.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

Account Information

If you would at any time like to review or change the information in your account or terminate your account, you can:

- Contact us using the contact information provided.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our legal terms and/or comply with applicable legal requirements.

Cookies and similar technologies: Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services. For further information, please see our Cookie Notice: https://privacy.cafex.ai/cookie/.

If you have questions or comments about your privacy rights, you may email us at compliance@cafex.com.

12. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this Privacy Notice.
California law requires us to let you know how we respond to web browser DNT signals. Because there currently is not an industry or legal standard for recognizing or honoring DNT signals, we do not respond to them at this time.

13. DO UNITED STATES RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

In Short: *If you are a resident of California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah, or Virginia, you may have the right to request access to and receive details about the personal information we maintain about you and how we have processed it, correct inaccuracies, get a copy of, or delete your personal information. You may also have the right to withdraw your consent to our processing of your personal information. These rights may be limited in some circumstances by applicable law. More information is provided below.*

Categories of Personal Information We Collect

The table below shows the categories of personal information we have collected in the past twelve (12) months. The table includes illustrative examples of each category and does not reflect the personal information we collect from you. For a comprehensive inventory of all personal information we process, please refer to the section "WHAT INFORMATION DO WE COLLECT?"

Category	Examples	Collected
A. Identifiers	Contact details, such as real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address, and account name	YES

Category	Examples	Collected
B. Personal information as defined in the California Customer Records statute	Name, contact information, education, employment, employment history, and financial information	YES
C. Protected classification characteristics under state or federal law	Gender, age, date of birth, race and ethnicity, national origin, marital status, and other demographic data	NO
D. Commercial information	Transaction information, purchase history, financial details, and payment information	NO
E. Biometric information	Fingerprints and voiceprints	NO
F. Internet or other similar network activity	Interactions with our website, such as pages viewed and how you navigate it	YES
G. Geolocation data	Approximate location (such as country or region) inferred from your IP address when you visit our website	YES
H. Audio, electronic, sensory, or similar information	Images and audio, video or call recordings created in connection with our business activities	NO
I. Professional or employment-related information	Business contact details in order to provide you our Services at a business level or job title, work history, and professional qualifications if you apply for a job with us	NO
J. Education Information	Student records and directory information	NO
K. Inferences drawn from collected personal information	Inferences drawn from any of the collected personal information listed above to create a profile or summary about, for example, an individual’s preferences and characteristics	NO
L. Sensitive personal Information		NO

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

- Receiving help through our customer support channels;
- Participation in customer surveys or contests; and
- Facilitation in the delivery of our Services and to respond to your inquiries.

We will use and retain the collected personal information as needed to provide the Services or for:

- Category A - Generally as long as the user has an account with us, unless a longer period is required or permitted by law
- Category B - Generally as long as the user has an account with us, unless a longer period is required or permitted by law
- Category F - Generally as long as the user has an account with us, unless a longer period is required or permitted by law
- Category G - Generally as long as the user has an account with us, unless a longer period is required or permitted by law

Sources of Personal Information

Learn more about the sources of personal information we collect in "WHAT INFORMATION DO WE COLLECT?"

How We Use and Share Personal Information

Learn more about how we use your personal information in the section, "HOW DO WE PROCESS YOUR INFORMATION?"

Will your information be shared with anyone else?

We may disclose your personal information with our service providers pursuant to a written contract between us and each service provider. Learn more about how we disclose personal information to in the section, "WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?"

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

We have not sold or shared any personal information to third parties for a business or commercial purpose in the preceding twelve (12) months. We have disclosed the following categories of personal information to third parties for a business or commercial purpose in the preceding twelve (12) months:

- Category A. Identifiers
- Category B. Personal information as defined in the California Customer Records law
- Category F. Internet or other electronic network activity information
- Category G. Geolocation data

Category F and G information is collected only on our website (cafex.ai) via Google Analytics; our application does not use analytics or collect device location. This information is limited to how you use our website and your approximate location inferred from your IP address, is disclosed only to our service providers (such as our analytics and website hosting providers), and is not used for advertising or sold.

The categories of third parties to whom we disclosed personal information for a business or commercial purpose can be found under "WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?"

Your Rights

You have rights under certain US state data protection laws. However, these rights are not absolute, and in certain cases, we may decline your request as permitted by law. These rights include:

- **Right to know** whether or not we are processing your personal data
- **Right to access** your personal data
- **Right to correct** inaccuracies in your personal data
- **Right to request** the deletion of your personal data
- **Right to obtain a copy** of the personal data you previously shared with us
- **Right to non-discrimination** for exercising your rights
- **Right to opt out** of the processing of your personal data if it is used for targeted advertising (or sharing as defined under California's privacy law), the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects ("profiling")

Depending upon the state where you live, you may also have the following rights:

- Right to access the categories of personal data being processed (as permitted by applicable law, including the privacy law in Minnesota)
- Right to obtain a list of the categories of third parties to which we have disclosed personal data (as permitted by applicable law, including the privacy law in California, Delaware, and Maryland)
- Right to obtain a list of specific third parties to which we have disclosed personal data (as permitted by applicable law, including the privacy law in Minnesota and Oregon)
- Right to obtain a list of third parties to which we have sold personal data (as permitted by applicable law, including the privacy law in Connecticut)
- Right to review, understand, question, and depending on where you live, correct how personal data has been profiled (as permitted by applicable law, including the privacy law in Connecticut and Minnesota)
- Right to limit use and disclosure of sensitive personal data (as permitted by applicable law, including the privacy law in California)
- Right to opt out of the collection of sensitive data and personal data collected through the operation of a voice or facial recognition feature (as permitted by applicable law, including the privacy law in Florida)

How to Exercise Your Rights

To exercise these rights, you can email us at compliance@cafex.com or use the contact details at the bottom of this document.

Under certain US state data protection laws, you can designate an authorized agent to make a request on your behalf. We may deny a request from an authorized agent that does not submit proof that they have been validly authorized to act on your behalf in accordance with applicable laws.

Request Verification

Upon receiving your request, we will need to verify your identity to determine you are the same person about whom we have the information in our system. We will only use personal information provided in your request to verify your identity or authority to make the request. However, if we cannot verify your identity from the information already maintained by us, we may request that you provide additional information for the purposes of verifying your identity and for security or fraud-prevention purposes.If you submit the request through an authorized agent, we may need to collect additional information to verify your identity before processing your request and the agent will need to provide a written and signed permission from you to submit such request on your behalf.

Appeals

Under certain US state data protection laws, if we decline to take action regarding your request, you may appeal our decision by emailing us at compliance@cafex.com. We will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If your appeal is denied, you may submit a complaint to your state attorney general.

California "Shine The Light" Law

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

14. CUSTOMER DATA PROCESSED ON BEHALF OF OUR CUSTOMERS

When our business customers use the CafeX Platform, they may upload or process personal information about their own employees, customers or partners (“Customer Data”). We process Customer Data only on behalf of, and under the instructions of, the relevant customer, as set out in our agreement with that customer. This Privacy Policy does not apply to Customer Data; the customer’s own privacy notice governs it. If you are an individual whose information is processed through the CafeX Platform by one of our customers, please direct any privacy questions or requests to that customer. Where we receive such a request directly, we will forward it to the relevant customer and assist them as required by our agreement and applicable law.

15. INFORMATION SECURITY AND CERTIFICATIONS

We maintain an information security management system certified to ISO/IEC 27001. Our controls are also aligned with ISO/IEC 42001 (AI management systems) and the SOC 2 Trust Services Criteria, and are continuously monitored through our compliance automation platform. More information is available at our Trust Center: https://trust.cafex.ai

16. AI CAPABILITIES IN THE CAFEX PLATFORM

The CafeX Platform includes optional artificial intelligence (AI) capabilities, such as natural language processing, AI-assisted automation and AI agents, and we continue to develop these as part of our roadmap. AI capabilities are turned off by default and are only enabled for a customer at that customer's request and under the terms of our agreement with them. When enabled, any personal information processed by AI features is Customer Data processed on our customer's behalf, as described in "Customer Data Processed on Behalf of Our Customers". We may use carefully selected third-party AI model providers, such as Amazon Web Services, Anthropic or OpenAI, under contractual terms that protect the confidentiality and security of the data and prohibit providers from using it to train their models. We govern our use of AI in line with ISO/IEC 42001. Our current list of subprocessors is available at our Trust Center: https://trust.cafex.ai

17. DO WE MAKE UPDATES TO THIS NOTICE?

In Short: *Yes, we will update this notice as necessary to stay compliant with relevant laws.*
We may update this Privacy Notice from time to time. The updated version will be indicated by an updated "Revised" date at the top of this Privacy Notice. If we make material changes to this Privacy Notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this Privacy Notice frequently to be informed of how we are protecting your information.

Last reviewed: November 06, 2026

18. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may email us at compliance@cafex.com or contact us by post at:
CafeX Communications Inc.

1460 Broadway

Suite 9054

New York, NY 10036

United States

If you are a resident in the United Kingdom, we are the "data controller" of your personal information. We have appointed Neil Ellis, CFX Communications Ltd to be our representative in the UK. You can contact them directly regarding our processing of your information, by email at compliance@cafex.com, by phone at 02920 001 674, or by post to:

Suite 5 Quest House

Fortran Road, St. Mellons

Cardiff CF3 0EY

Wales

19. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Based on the applicable laws of your country or state of residence in the US, you may have the right to request access to the personal information we collect from you, details about how we have processed it, correct inaccuracies, or delete your personal information. You may also have the right to request we limit the use or disclosure of your personal information or withdraw your consent to our processing of your personal information. These rights may be limited in some circumstances by applicable law. To request to review, update, or delete your personal information, please email us at compliance@cafex.com.

The current version of this Privacy Policy is published at https://privacy.cafex.ai/. Questions: compliance@cafex.com.